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**Subject: Devil's Gate Reservoir Sediment Removal and Management Project Reduced Sediment Removal Alternative Environmental Review**

Dear Ms. Yu,

On November 12, 2014, the Los Angeles County Board of Supervisors, acting as the Governing Board of the Los Angeles County Flood Control District (LACFCD), certified the Final Environmental Impact Report (FEIR) for the Devil's Gate Reservoir Sediment Removal and Management Project (Proposed Project) and approved the Environmentally Superior Alternative (Alternative 3, Configuration D, Option 2) in conjunction with Alternative 5, Haul Route Alternative. Under Alternative 3, Configuration D (Approved Project), the sediment removal activities would remove approximately 2.4 million cubic yards (mcy) of excess sediment in the Devil's Gate Reservoir in addition to any additional sediment received from storm flows during the sediment removal phase.

The County is investigating a modified version of the Approved Project that would not change the footprint but would reduce the volume of sediment removal from 2.4 mcy to 1.7 mcy, in addition to any additional sediment received from storm flows during the sediment removal phase (Modified Alternative 3, Configuration D, Option 2). Under this modified alternative, the duration of the initial sediment removal phase would be decreased by one year from what was expected in the Approved Project. The Modified Alternative 3, Configuration D, Option 2 would also include Alternative 5, Haul Route Alternative. Reservoir management activities under the Modified Alternative 3, Configuration D, Option 2 Alternative would remain the same as the Approved Project.

The County has asked ECORP Consulting, Inc. (ECORP) to analyze the environmental impacts that would result from the Modified Alternative 3, Configuration D, Option 2 and Alternative 5, Haul Route Alternative. This letter contains ECORP's environmental analysis, which compares the impacts of the Approved Project to impacts that could occur under the Modified Alternative 3, Configuration D, Option 2 and Alternative 5, Haul Route Alternative. Please note that the following environmental analysis does not include an analysis of Alternative 5, Haul Route Alternative because this portion of the project would remain the same as discussed in Section 7.2.5 of the *Revised Findings of Fact Devil's Gate Reservoir Sediment Removal and Management Project Pasadena, CA* (October 2017).

## Environmental Analysis

Table 1 summarizes potentially significant impacts of the Proposed Project and Alternatives and Table 2 summarizes potentially significant impacts of the Approved Project and Modified Alternative 3, Configuration D, Option 2.

**Table 1: Summary Comparison of Potentially Significant Impacts of Proposed Project and Alternatives**

Resource	Proposed Project Configuration A	Alternative 1 Configuration B	Alternative 2 Configuration C	Alternative 3 Configuration D, Option 2 <sup>1</sup> (Approved Project)	Modified Alternative 3 Configuration D, Option 2	Alternative 4 Sluicing	Alternative 5 Haul Route Alternative	Alternative 6 No Project
Aesthetics	Significant and Unavoidable	Reduced	Reduced	Reduced	Reduced	Increased	Similar	Potentially Increased
Air Quality	Less than Significant with Mitigation	Reduced	Increased	Reduced	Reduced	Potentially Increased	Similar	Reduced
Biological Resources	Less than Significant with Mitigation	Reduced	Reduced	Reduced	Reduced	Potentially Increased	Similar	Potentially Increased
Cultural Resources	Less than Significant with Mitigation	Reduced	Similar	Reduced	Reduced	Similar	Similar	Reduced
Land Use and Planning	Less than Significant with Mitigation	Reduced	Reduced	Reduced	Reduced	Increased	Similar	Potentially Increased
Noise/Vibration	Less than Significant with Mitigation	Reduced	Increased	Reduced	Reduced	Potentially Increased	Similar	Reduced
Transportation and Traffic	Temporary, Significant and Unavoidable	Reduced	Increased	Reduced <sup>2</sup>	Reduced <sup>2</sup>	Potentially Increased	Reduced	Reduced

Reduced= reduced impact compared to the Proposed Project

Similar = similar impact compared to the Proposed Project

Increased = increased impact compared to the Proposed Project

<sup>1</sup>Alternative 3, Configuration D, Option 2 is the Environmentally Superior Alternative

<sup>2</sup> Although impacts would be reduced in comparison with the Proposed Project, they would remain significant and unavoidable.

**Table 2: Summary Comparison of Potentially Significant Impacts of Approved Project and Modified Alternative 3, Configuration D, Option 2**

Resource	Alternative Configuration D <sup>1</sup> (Approved Project)	Modified Alternative 3, Configuration D, Option 2
Aesthetics	Significant and Unavoidable	Similar
Air Quality	Less than Significant with Mitigation	Reduced
Biological Resources	Less than Significant with Mitigation	Reduced
Cultural Resources	Less than Significant with Mitigation	Similar
Land Use and Planning	Less than Significant with Mitigation	Similar
Noise/Vibration	Less than Significant with Mitigation	Similar
Transportation and Traffic	Temporary, Significant and Unavoidable	Reduced <sup>2</sup>

Reduced= reduced impact compared to the Approved Project

Similar = similar impact compared to the Approved Project

Increased = increased impact compared to the Approved Project

<sup>1</sup>Alternative 3, Configuration D is the Environmentally Superior Alternative

<sup>2</sup> Although reduced in comparison with the Approved Project, they would remain significant and unavoidable.

The following is a comparative discussion of the environmental impacts from the Modified Alternative 3, Configuration D, Option 2 and the Approved Project (Alternative 3, Configuration D, Option 2).

### **Aesthetics**

Aesthetic impacts associated with this alternative would be similar as those associated with the Approved Project because both alternatives would have the same project footprint and both would result in the same amount of vegetation removal. Sediment removal activities associated with the Modified Alternative 3, Configuration D, Option 2 would change the visual characteristics of the reservoir through the removal of sediment and associated vegetation in the reservoir. These changes would be similar to the Approved Project at the south end of the reservoir.

As with the Approved Project, excavation and associated activities within the reservoir area are expected to take place during drier months, from April to December, as weather permits but the duration of the initial excavation would be decreased by one year. During the wetter months, changes to the visual characteristics associated with sediment removal would be slightly less apparent when water is stored in the basin. Some regrowth of riparian vegetation would likely occur during this time. Both of these factors would reduce the change in the visual characteristics associated with sediment removal. The sediment removal activities associated with the Modified Alternative 3, Configuration D, Option 2 would not introduce view obstructing features.

Due to the multi-year duration of the sediment removal phase under both the Approved Project and the Modified Alternative 3, Configuration D, Option 2, the large-scale alteration, visibility of the site, and level of viewer sensitivity, sediment removal activities would be a significant impact to scenic vistas. The footprint of the area where sediment removal would occur with the Modified Alternative 3, Configuration D, Option 2 would be the same as the Approved Project and therefore, would result in a similar significant impact to scenic vistas.

As with the Approved Project, reservoir management would not result in obstruction or blockage of views and construction equipment would be visible in the basin but only for short periods of time.

After completion of the proposed sediment removal activities associated with the Modified Alternative 3, Configuration D, Option 2, the majority of the reservoir would be allowed to naturally regrow vegetation and/or remain in place and the trees on the border of the reservoir management area are expected to become dominant features within the reservoir. The area available for regrowth would be similar to the Approved Project. Therefore, reservoir management under the Modified Alternative 3, Configuration D, Option 2 would result in a similar degree of contrast than seen during sediment removal and would result in a less than significant impact to scenic vistas.

No feasible mitigation measures were identified for sediment removal, and this impact remains significant and unavoidable. For reservoir management, the less than significant impacts would be further reduced through the implementation of Mitigation Measures MM BIO-6, MM BIO-7, and MM BIO-8.

## **Air Quality**

Under the Modified Alternative 3, Configuration D, Option 2 the total amount of sediment removal and overall duration of removal activities would be reduced in comparison to the Approved Project. The type of construction activities and equipment, daily rate of truck trips, and amount of sediment removal would be the same as the Approved Project; however, the duration of initial sediment removal would be reduced by approximately one year.

As with the Approved Project, sediment removal activities under this alternative would have the potential to violate an air quality standard or contribute substantially to an existing or projected air quality violation. With implementation of Mitigation Measures MM AQ-1 and MM AQ-2, impacts during sediment removal under the Modified Alternative 3, Configuration D, Option 2 would be less than significant.

Reservoir management activities under the Modified Alternative 3, Configuration D, Option 2 would not violate any air quality standards or contribute substantially to any existing or projected air quality violations; therefore, no significant impact would occur under either reservoir management options.

Emissions of volatile organic compounds (VOC), particulate matter with a diameter of 10 microns or less (PM<sub>10</sub>), and articulate matter with a diameter of 2.5 microns or less (PM<sub>2.5</sub>) are not expected to exceed the South Coast Air Quality Management District (SCAQMD) regional significance thresholds during sediment removal or reservoir management activities. Nitrogen oxides (NO<sub>x</sub>) emissions are not expected to exceed the SCAQMD regional significance thresholds during reservoir management activities. Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 would result in a reduction of NO<sub>x</sub> emissions and would reduce the NO<sub>x</sub> emissions to a level of less than significant for the sediment removal phase. The SCAQMD considers construction-related emissions that do not exceed the project specific thresholds would not result in a cumulative impact. Therefore, similar to the Approved Project, Modified Alternative 3, Configuration D, Option 2 would not result in a cumulative impact.

As with the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would not exceed localized significance threshold (LST) or State or federal carbon monoxide (CO) standards, and would not create significant cancer or non-cancer risks or significant objectionable odors for sediment removal and reservoir management activities.

Air quality impacts associated with the Modified Alternative 3, Configuration D, Option 2 are considered reduced in comparison to the Approved Project due to the reduction in sediment removal, which would decrease the duration of the initial sediment removal activities by approximately one year.

## **Biological Resources**

As with the Approved Project, Modified Alternative 3, Configuration D, Option 2 is not expected to have a substantial adverse effect on any plant species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by CDFW or USFWS. Similar to the Approved Project, Modified Alternative 3, Configuration D, Option 2 would not result in significant

impacts to special status animal species or habitat, jurisdictional wetlands or drainages, wildlife nursery sites, or city-protected trees with the implementation of Mitigation Measures MM BIO-1 through MM BIO-8.

The impacts to Riversidean Alluvial Fan Sage Scrub, Coastal Sage Scrub, and riparian habitats (Riparian Woodland and Mule Fat Thickets) associated with Modified Alternative 3, Configuration D, Option 2 would be the same as the impacts to these vegetation communities resulting from the Approved Project. To compensate for the loss of these plant communities resulting from the Modified Alternative 3, Configuration D, Option 2, the LACFCD would apply the same mitigation measures as those that would be applied for the Approved Project. The LACFCD would restore and enhance Riversidean Alluvial Fan Sage Scrub, Coastal Sage Scrub, and riparian habitats either onsite or offsite to achieve not less than a 1:1 replacement, or no net loss, of these communities (MM BIO-6, MM BIO-7, and MM BIO-8). The implementation of Mitigation Measures MM BIO-6, MM BIO-7, and MM BIO-8 would reduce impacts to Riversidean Alluvial Fan Sage Scrub, Coastal Sage Scrub, and riparian habitats (Riparian Woodland and Mule Fat Thickets) to a level below significance.

Compared to the Approved Project, the impacts to federally-protected wetlands, water features, drainages, and the associated riparian habitats and other sensitive natural communities that fall under the jurisdiction of the California Department of Fish and Wildlife (CDFW) and the U.S. Army Corps of Engineers (USACE) resulting from the Modified Alternative 3, Configuration D, Option 2 would be the same as those resulting from the Approved Project. Mitigation for the impacts of the Modified Alternative 3, Configuration D, Option 2 would be the same as the mitigation applied for the Approved Project. The LACFCD would restore and enhance riparian habitats, other sensitive natural communities, and federally-protected wetlands (wetland and non-wetland Waters of the U.S.) within onsite or offsite CDFW jurisdictional areas to achieve not less than a 1:1 replacement, or no net loss, of these habitats within CDFW jurisdictional areas (MM BIO-6, MM BIO-7, and MM BIO-8). The implementation of Mitigation Measures MM BIO-6, MM BIO-7, and MM BIO-8 would reduce impacts of Modified Alternative 3, Configuration D, Option 2 to federally-protected wetlands, water features, drainages, and the associated riparian habitats and other sensitive natural communities that fall under the jurisdiction of the CDFW and the USACE to a level below significance.

Compared to the Approved Project, the impacts to riparian and other sensitive habitats that support wildlife movement, wildlife migration, and wildlife nursery sites resulting from Modified Alternative 3, Configuration D, Option 2 would be reduced in comparison to the impacts resulting from the Approved Project. The reduction in the impacts would result from a decrease in the duration of the initial sediment removal activities by approximately one year. The decrease in impacts would result from one less year of equipment removing sediment in areas adjacent to retained riparian and other sensitive habitats during the bird nesting season. The mitigation for impacts to wildlife movement, wildlife migration, and wildlife nursery sites associated with Modified Alternative 3, Configuration D, Option 2 would be the same as the mitigation measures applied for the Approved Project. The implementation of Mitigation Measures MM BIO-1 through MM BIO-8 would reduce impacts of Modified Alternative 3, Configuration D, Option 2 to habitats supporting wildlife movement, wildlife migration, and wildlife nursery sites to a level below significance.

Compared to the Approved Project, the impacts to City-protected trees resulting from Modified Alternative 3, Configuration D, Option 2 would be the same as the impacts resulting from the Approved Project. The mitigation measures applied for Modified Alternative 3, Configuration D, Option 2 to offset the impacts to City-protected trees would be the same as those applied for the Approved Project. Implementation of Mitigation Measure MM BIO-7 would reduce impacts to city-protected trees to a level below significance.

Impacts to biological resources associated with Modified Alternative 3, Configuration D, Option 2 are considered reduced in comparison to the Approved Project due to the reduction in the duration of the initial sediment removal and the reduced presence of equipment working in areas adjacent to retained natural habitats during the bird nesting season. These mitigations for impacts to biological resources (MM BIO-1 through MM BIO-8) are enforceable through the Mitigation Monitoring and Reporting Program.

### **Cultural Resources**

Similar to the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would not result in significant impacts to archaeological or paleontological resources or human remains with the implementation of Mitigation Measures MM CUL-1 through MM CUL-3. Impacts to cultural resources associated with this alternative are considered similar in comparison to the Approved Project.

### **Geology and Soils**

Similar to the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would not result in significant impacts to geology and soils. The less than significant impacts associated with soil erosion would be similar under this alternative in comparison to the Approved Project.

### **Greenhouse Gas Emissions**

Similar to the Approved Project, Modified Alternative 3, Configuration D, Option 2 would not result in significant impacts to greenhouse gas emissions. The less than significant impacts would be further reduced under Modified Alternative 3, Configuration D, Option 2 in comparison to the Approved Project due to the reduction in sediment removal, which would reduce the duration of the initial sediment removal activities.

### **Hazards and Hazardous Materials**

Similar to the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would not result in significant impacts associated with hazardous materials. The less than significant impacts would be further reduced under this alternative in comparison to the Approved Project due to the reduction in sediment removal, which would reduce the duration of the initial sediment removal activities. As with the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would not result in significant impacts to any emergency response plan or emergency evacuation plan.

## **Hydrology and Water Quality**

As with the Approved Project, the Modified Alternative 3, Configuration D, Option 2 Alternative would not result in significant impacts to water quality or drainage or groundwater.

## **Land Use and Planning**

Similar to the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would result in impacts associated with temporarily restricted access to portions of designated trails and indirect impacts to existing recreation uses associated with construction activities. With the implementation of Mitigation Measure MM LAN-1, these impacts would be less than significant. These impacts would be further reduced under the Modified Alternative 3, Configuration D, Option 2 in comparison to the Approved Project due to the reduction in the duration of the initial sediment removal. Overall, as with the Approved Project, this alternative would not have any significant impacts or conflict with the applicable land use plans, policies, or regulations of adopted plans.

## **Mineral Resources**

Same as the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would not result in significant impacts to mineral resources.

## **Noise and Vibration**

Similar to the Approved Project, under the Modified Alternative 3, Configuration D, Option 2, impacts associated with noise or groundborne vibration would be reduced to less than significant with implementation of Mitigation Measure MM N-1. These impacts would be further reduced under this alternative in comparison to the Approved Project due to the shorter time frame required to remove less sediment during the initial sediment removal phase.

## **Recreation/Public Services**

As with the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would not result in significant impacts to fire and police protection services, schools, or other public facilities. Similar to the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would not result in significant impacts associated with increased use of other existing parks or recreation facilities or construction or expansion of existing recreational facilities. The less than significant impacts would be further reduced under the Modified Alternative 3, Configuration D, Option 2 in comparison to the Approved Project due to the reduction in the duration of the initial sediment removal phase.

## **Transportation and Traffic**

As with the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would not result in impacts to air traffic patterns. As with the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would not result in significant impacts associated with traffic hazards or emergency access.

Similar to the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would result in significant impacts to traffic LOS on the existing roadway network and impacts to bus services during

the sediment removal phase. Implementation of Mitigation Measures MM TRA-1 and MM TRA-2 would reduce this impact but not to a level of less than significant for the following intersections:

1. Berkshire Place and I-210 eastbound ramps during the AM peak period.
2. Figueroa Street/Scholl Canyon Road and SR-134 westbound ramps during the AM and PM peak hours.
3. Glenoaks Boulevard/Osborne Street intersection during the AM and PM peak hours.

Other potential impact reduction measures discussed in Section 6.2 of the *Revised Findings of Fact Devil's Gate Reservoir Sediment Removal and Management Project Pasadena, CA* (October 2017) could reduce impacts to less than significant. These measures cannot be legally imposed by LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort would be made to coordinate with and receive approval from the jurisdictional agencies to implement the impact reduction measures, but LACFCD cannot guarantee that the measures would be implemented. Therefore, these impacts could remain potentially significant. These impacts would be less than significant under the reservoir management phase.

As noted in Table 2, this impact would be temporary, significant, and unavoidable. The Modified Alternative 3, Configuration D, Option 2 would include less sediment removal thereby reducing the length of time required to remove the sediment by approximately one year. Therefore, this alternative would reduce the length of time of significant and unavoidable traffic impacts to the previously mentioned intersections.

### **Utilities and Service Systems**

As with the Approved Project, the Modified Alternative 3, Configuration D, Option 2 would not result in significant impacts to utilities and service systems.

### **Conclusion**

Reducing the volume of sediment removal from 2.4 mcy to 1.7 mcy, thereby reducing the duration of the initial sediment removal phase by approximately one year, with the modified project would result in reduced impacts to air quality, biological resources, greenhouse gases, recreation/public services, and transportation and traffic from those that were anticipated with the Approved Project. Impacts to aesthetics, cultural resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, noise/vibration, and utilities would be similar to those that were anticipated with the Approved Project. All mitigation measures that would apply to the Approved Project would apply to the Modified Alternative 3, Configuration D, Option 2.

Sincerely,

**ECORP Consulting, Inc.**



Anne Surdzial, AICP  
Director of CEQA/NEPA Services