

SECTION 8.0 – CLARIFICATIONS AND MODIFICATIONS

The following clarifications and revisions are intended to update the Draft EIR in response to the comments received during the public review period. These changes, which have been incorporated into the Draft EIR, constitute the Final EIR, to be presented to the County of Los Angeles Board of Supervisors for certification and approval. These modifications clarify, amplify, or make insignificant changes to the EIR. Revisions to the EIR have not resulted in new significant impacts or mitigation measures or increased the severity of an impact. None of the criteria for recirculation set forth in the CEQA Guidelines section 15088(a) have been met, and recirculation of the EIR is not required.

The changes to the Draft EIR are listed by section and page number. Text which has been removed is shown in this chapter with a strikethrough line, while text that has been added is shown with bold and italics. All of the changes shown in this section have also been made in the corresponding Final EIR sections. Minor editorial corrections (e.g., typographical, grammatical, etc.) have been made throughout the document and are not indicated by strikethrough or ***bold italics*** text. Please refer to Section 9.0 – Response to Comments, for referenced comment letters and corresponding comments.

Section	Executive Summary
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Page	Clarification/Revision
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ES-3	After the 3 rd paragraph under E.S.2.2 Project Background, the following paragraphs have been added:
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The Los Angeles County Flood Control Act (Act) was adopted by the State Legislature in 1915 after a disastrous regional flood took a heavy toll on lives and property. The Act established the Los Angeles County Flood Control District (LACFCD) and empowered it to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 County of Los Angeles Department of Public Works Hydrology Manual and the March 2006 County of Los Angeles Department of Public Works Sedimentation Manual.

LACFCD established the required design capacity at two DDEs to ensure that the reservoir always has sufficient capacity to maintain the level of downstream flood protection. By establishing the design capacity at two DDEs, the reservoir is likely to have sufficient capacity to experience a design level storm, or several smaller but significant debris events, and still maintain capacity of at least one DDE during the lengthy environmental and construction processes to remove the debris. Further, it should be noted that additional criteria in special circumstances related to dam safety may also dictate the need to remove sediment from a reservoir:

- ***Depending on the structural stability of the dam, the height of sediment against the dam may need to be limited (sediment weighs more than water and increases the forces on the dam during an earthquake).***

- **The volume of sediment accumulation may also be limited to prevent sediment from blocking valves/operations (if the debris blocks the outlet valves, they cannot be used to regulate storm flows or to empty the dam during an emergency).**

Therefore, to minimize flood risk for Devil's Gate Dam and Reservoir, the required reservoir capacity is based on debris control and is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

For more information on the DDE calculations, please review the Hydrology and Sedimentation Manuals at the following locations:

The Hydrology Manual (January 2006) can be viewed here:

http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf

The Sedimentation Manual (March 2006) can be viewed here:

http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf

ES-5 In the 1st paragraph under Sediment Disposal, the following details have been added:

Excavated sediment will be trucked offsite to existing disposal site locations which are currently available to accept the sediment. Trucks will travel and place sediment at one of the primary disposal site locations, the Waste Management Facility in Azusa, the Vulcan Materials Reliance Facility in Irwindale, or the Manning Pit Sediment Placement Site (SPS) in Irwindale. Secondary disposal sites are the facilities in Sun Valley (Sheldon Pit, Sun Valley Fill Site, Bradley Landfill, and Boulevard Pit). **Over the life of the Proposed Project sediment removal phase, it** is estimated that the eastern disposal sites will be used from 80 to 100 percent of the time. Use of the Sun Valley sites is estimated to occur from 0 to 20 percent of the time **throughout the Proposed Project sediment removal phase**. Removed vegetation and organic debris will be hauled to Scholl Canyon Landfill located in the City of Glendale.

ES-8 In the 4th and 5th paragraphs under Option 1 – Entire Configuration A Management Area, the following paragraph has been added:

Sediment Excavation/Trucking Offsite: Depending on the efficiency of the FAST operations, some mechanical excavation and trucking offsite may be required for removal of accumulated sediment. Sediment excavation/trucking offsite will use the same methods and trucking routes as under the sediment removal phase. It is estimated, based on past storm events, that sediment excavation/trucking offsite will be required to **typically** remove ~~an average of~~ 13,000 cy of sediment annually. Based on an estimated removal of 4,800 cy per day, it is expected this will occur over an estimated two-week period, Monday through Friday. This removal activity will take place during the late summer/early fall following vegetation maintenance.

Moderately large sediment deposits have the potential to occur during a storm season, but it is anticipated that even with this type of event the newly deposited sediment could be removed in one season. A moderately large sediment removal event, anticipated to involve around 170,000 cy, could take place over an estimated 12-week period during the late summer/early fall following the vegetation maintenance.

ES-10 In the 3rd paragraph under E.S.3 Areas of Controversy/Issues To Be Resolved, the following edits have been made:

A Notice of Preparation (NOP) and Initial Study (IS) was released on September 28, 2011 (Appendix A); and two Public Scoping meetings were held on October 5 and October 15, 2011. Comments received during a 45-day comment period were considered and incorporated into this document. ~~Two public scoping meetings were held for the Proposed Project, one on October 5, 2011, and one on October 15, 2011.~~ The scoping meeting introduced the Proposed Project, outlined the environmental review process for the EIR, and invited **the public to submit** comments on the scope and content of the EIR. Approximately 50 members of the public attended each meeting. Issues and concerns raised at the public scoping meetings included disruption to neighbors, destruction of biodiversity and habitat, restoring natural processes in the reservoir, sluicing sediment as an alternative, sensitivity to surrounding land uses including the high school, and coordination with agencies and affected users. The key issues and areas of controversy are detailed in Section 1.0 – Introduction, subsection 1.4. In addition to the comments provided at the interviews and scoping meetings, several comments were received in response to the Notice of Preparation (NOP)/Initial Study (IS) for this EIR. The primary areas of controversy identified by the public and agencies include impacts to traffic, air quality, noise in the surrounding areas, land use issues, and impacts to recreation.

ES-11 In the 1st paragraph under E.S.5 Summary of Potential Impacts and Mitigation Measures, the following revisions have been made:

The analysis undertaken for this Final EIR has determined that impacts to **Air Quality**, Biological Resources, Cultural Resources, Land Use and Planning, and Noise could be mitigated to a level of less than significant. Unmitigable significant impacts include **significant** impacts to Aesthetics and **temporary significant impacts to** Traffic/Transportation.

ES-12 In the 3rd full row of Table ES-1, the following clarifications have been made:

Air Quality		
Air Quality-1: Conflict with the implementation of SCAQMD air quality management plan due to sediment removal emissions of NO _x exceeding the Daily Regional Threshold will result in a significant impact.	<p>MM AQ-1: LACFCD shall require all construction contractors during the sediment removal phase of the Proposed Project to use <i>only</i> sediment removal dump trucks that meet the EPA's emission standards for Model Year 2007 <i>or later as reasonably feasible</i>.</p> <p>MM AQ-2: LACFCD shall require all construction contractors during the sediment removal phase of the Proposed Project to use off-road equipment that meets, at a minimum, EPA's emission standards for Tier 3 equipment.</p>	Less than Significant Full implementation of these mitigations could be unachievable. Therefore, impact remains significant and unavoidable.
Air Quality-2 and Air Quality-3: Sediment removal emissions of NO _x will exceed the SCAQMD Daily Regional Threshold, resulting in a significant impact to an air quality standard.	See MM AQ-1 and MM AQ-2.	Less than Significant Full implementation of these mitigations could be unachievable. Therefore, impact remains significant and unavoidable.
Air Quality 6: Sediment removal emissions of NO _x will exceed the SCAQMD Daily Regional Threshold, resulting in a cumulatively significant impact.	See MM AQ-1 and MM AQ-2.	Less than Significant Full implementation of these mitigations could be unachievable. Therefore, impact remains significant and unavoidable.

ES-12 In the 6th full row of Table ES-1 under Biological Resources, the following clarifications have been made:

Biological Resources		
Biology-1: Removal of habitat during sediment removal will result in a potentially significant impact to five special status wildlife species (least Bell's vireo, yellow warbler, southwestern pond turtle, coast range newt, and two-striped garter snake) and nesting native birds and roosting bats.	<p>MM BIO – 1: A qualified biological monitor shall be present during initial ground- or vegetation-disturbing project-related activities <i>to provide measures and monitor for wildlife in harm's way. This includes initial ground- or vegetation-disturbing project-related activities at the annual start of each year of sediment removal or maintenance activities.</i> Following initial project-related activities, a qualified monitoring biologist shall be present as necessary to maintain the implemented protection measures and monitor for additional species in harm's way. <i>These protection measures shall include, as appropriate: redirecting wildlife, identifying areas that may require exclusionary devices (e.g., fencing), or capturing and relocating wildlife</i></p>	Less than significant

outside the work area. Any captured species shall be relocated to adjacent appropriate habitat that is contiguous to adjacent habitat and not impacted by project-related disturbance activities.

MM BIO – 2: Within 90 days prior to ground-disturbing activities, a sensitive species educational briefing shall be conducted by a qualified biologist for construction personnel. The biologist will identify all sensitive resources that may be encountered onsite, and construction personnel will be instructed to avoid and report any sightings of sensitive species to LACFCD or the monitoring biologist. Educational briefings shall be repeated annually for the duration of the sediment removal.

MM BIO – 3: Within 90 days prior to ground-disturbing activities, a preconstruction survey shall be conducted by a qualified biologist for the presence of any sensitive species in harm's way, including coast range newt, the southwestern pond turtle, and the two-striped garter snake. If sensitive species are observed in harm's way, the qualified biologist will develop and implement appropriate protection measures for that species. These protection measures shall include, as appropriate: redirecting the species, ~~constructing of~~ exclusionary devices (e.g., fencing), or ~~capturing-capture-and relocating relocation~~ **wildlife** outside the work area. Preconstruction **surveys** shall be repeated annually for the duration of the sediment removal. **Observations of special status species made during these surveys shall be recorded onto a CNDDDB field data sheet and submitted to CDFW for inclusion into the CNDDB.**

MM BIO – 4: LACFCD, in consultation with a qualified biologist, will employ bird exclusionary measures (e.g., mylar flagging) prior to the start of bird breeding season to prevent birds nesting within established boundaries of the project. Prior to commencement of sediment removal activities within bird breeding season (March 1-August 31), a preconstruction bird nesting survey shall be conducted by a qualified biologist for the presence of any nesting bird within 300 feet of the construction work area. The surveys shall be conducted 30 days prior to the disturbance of suitable nesting habitat by a qualified biologist with experience in conducting nesting bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work. Preconstruction surveys shall be repeated annually for the duration of the sediment removal.

If an active nest is found, the qualified biologist will develop and implement appropriate protection measures for that nest. These protection measures shall include, as appropriate, construction of exclusionary devices (e.g., netting) or avoidance buffers. The biologist shall have the discretion to adjust the buffer

<p>area as appropriate based on the proposed construction activity, the bird species involved, and the status of the nest and nesting activity; but shall be no less than 30 feet. Work in the buffer area can resume once the nest is determined to be inactive by the monitoring biologist.</p> <p>MM BIO – 5: Within 30 days prior to commencement of vegetation or structure removal activities, a preconstruction bat survey shall be conducted by a qualified biologist for the presence of any roosting bats. Acoustic recognition technology shall be used if feasible and appropriate. If either a bat maternity roost or hibernacula (structures used by bats for hibernation) are present, a qualified biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. These protection measures shall include, as appropriate: safely evicting non-breeding bat hibernacula, establishment of avoidance buffers, or replacement of roosts at a suitable location. These measures shall also include as appropriate:</p> <ul style="list-style-type: none">▪ To the extent feasible, trees that have been identified as roosting sites shall be removed or relocated between October 1 and February 28.▪ When trees must be removed during the maternity roost season (March 1 to September 30), a qualified bat specialist shall conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.▪ Trees identified as potentially supporting an active nursery roost shall be inspected by a qualified biologist no greater than 7 days prior to tree disturbance to determine presence or absence of roosting bats.▪ Trees determined to support active maternity roosts will be left in place until the end of the maternity season (September 30).▪ If bats are not detected in a tree, but the qualified biologist determined that roosting bats may still be present, trees shall be removed as follows:<ul style="list-style-type: none">○ Pushing the tree down with heavy machinery instead of felling the tree with a chainsaw○ First pushing the tree lightly 2 to 3 times with a pause of 30 seconds in between each nudge to allow bats to become active, then pushing the tree to the ground slowly○ Allowing the tree to remain in place for 24 to 48 hours until inspected by the qualified biologist for presence or absence
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	<p style="text-align: center;">of roosting bats</p> <ul style="list-style-type: none"> ▪ The qualified biologist shall document all bat survey, monitoring, and protection measure activities and prepare a summary report for LACFCD. 	
<p>Biology-2: A significant impact will occur to riparian habitats and sensitive habitats.</p>	<p>MM BIO – 6: Riversidean Alluvial Fan Sage Scrub habitat shall be restored and/or enhanced at a 1:1 ratio by acreage. Areas shall be mapped using aerial photographs.</p> <p>MM BIO – 7: Within 90 days prior to ground-disturbing activities, a qualified biologist shall conduct a tree survey within the project footprint, to identify trees that will be removed or potentially affected by the Proposed Project and trees that can be avoided. LACFCD will replace trees that cannot be avoided. The replacement is expected to be up to 1:1 by acreage. The biological monitor shall implement measures to protect the root zone of oak trees that may be impacted immediately adjacent to the project site and along access roads.</p> <p>MM BIO – 8: A combination of onsite and offsite habitat restoration, enhancement, and exotic removal shall be implemented by LACFCD at a 1:1 ratio for impacted sensitive habitat and jurisdictional waters. Habitat restoration/enhancement shall include use of willow cuttings and exotic species removal. Non-native, weedy Ruderal habitats within the basin shall be utilized whenever possible as mitigation sites. This mitigation measure shall be monitored for success for five years following implementation. A report of the monitoring results shall be submitted annually, during the five years following implementation, to resource agencies as required by the Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement.</p>	<p>Less than significant</p>

ES 17 through ES 20 In the four rows of Table ES-1 under Traffic and Transportation, the following clarifications have been made:

Transportation and Traffic		
<p>Transportation-1: Temporary significant impacts to haul route intersections could cause a substantial increase in traffic which would affect the efficiency of the circulation system.</p>	<p>MM TRA-1: Proposed Project haul trucks will not deliver to the Vulcan Material Reliance Facility during the PM peak period. MM TRA-2: Proposed Project haul trucks will not deliver to the Boulevard Pit during the PM peak period.</p>	<p>Implementation of the mitigation measures would reduce impacts but not to a level of less than significant. Other potential impact reduction measures could reduce impacts to less than significant; however, these measures cannot be legally imposed by the LACFCD, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this temporary impact could remain potentially significant.</p>

<p>Transportation-2: Proposed Project traffic associated with sediment removal could adversely affect traffic level of service at the following intersections, resulting in a temporary significant impact:</p> <p>Berkshire Place and I-210 Eastbound Ramps intersection during the AM peak period;</p> <p>Figueroa St/Scholl Canyon Road and SR-134 Westbound Ramps during the AM and PM peak periods;</p> <p>Irwindale Avenue/Foothill Boulevard intersection during the PM peak hour;</p> <p>Glenoaks Boulevard and Osborne Street intersection during the AM and PM peak periods;</p> <p>Sheldon Street and San Fernando Road intersection during the PM peak period;</p> <p>and</p> <p>Branford Street and San Fernando Road intersection during the PM peak period.</p>	<p>See MM TRA-1 and MM TRA-2.</p>	<p>Implementation of the mitigation measures would reduce impacts but not to a level of less than significant. Other potential impact reduction measures could reduce impacts to less than significant; however, these measures cannot be legally imposed by the LACFCD, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this temporary impact could remain potentially significant.</p>
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<p>Transportation-5: Reduction of LOS at intersections could affect buses using the existing roadway network, resulting in a temporary significant impact.</p>	<p>See MM TRA-1 and MM TRA-2.</p>	<p>Implementation of the mitigation measures would reduce impacts but not to a level of less than significant. Other potential impact reduction measures could reduce impacts to less than significant; however, these measures cannot be legally imposed by the LACFCD, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this temporary impact could remain potentially significant.</p>
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<p>Transportation-6: During sediment removal the Proposed Project will result in significant delays at the following intersections, resulting in significant cumulative impacts. These intersections include:</p> <p>Berkshire Place and I-210 Eastbound Ramps intersection during the AM peak period; Irwindale Avenue/Foothill Boulevard intersection during the PM peak hour;</p> <p>Figuroa St/Scholl Canyon Road and SR-134 Westbound Ramps during the AM and PM peak periods;</p> <p>Glenoaks Boulevard and Osborne Street intersection during the AM and PM peak periods;</p> <p>Sheldon Street and San Fernando Road intersection during the PM peak period; and</p> <p>Branford Street and San Fernando Road intersection during the PM peak period.</p>	<p>See MM TRA-1 and MM TRA-2.</p>	<p>Implementation of the mitigation measures would reduce impacts but not to a level of less than significant. Other potential impact reduction measures could reduce impacts to less than significant; however, these measures cannot be legally imposed by the LACFCD, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this temporary impact could remain potentially significant.</p>
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ES-21 After the 1st paragraph under E.S.6 Project Alternatives, the following information has been added:

Alternative 3, Configuration D, which was found to be the Environmentally Superior Alternative in the Draft EIR, was based on the City of Pasadena's Hahamongna Watershed Park Master Plan (HWPMP). Alternative 3, Configuration D, Option 2 drastically reduces the project's footprint of 120 acres down to 71 acres. Additionally, the limited maintenance area for Alternative 3 further reduces the permanent habitat impacts down to approximately 51 acres by allowing for site replanting and mitigation to take place within the reservoir footprint. This reduction in project acreages will greatly lessen environmental impacts of the Proposed Project.

As shown in the Draft EIR, Section 4.6, Alternative 3 receives an in-depth analysis which present the potential impacts of each of the alternative and compares the impacts of the alternative to the Proposed Project and each of the other alternatives; providing ample information as to why this alternative was found to be the Environmentally Superior Alternative. Section 4.11 is a summary of these findings. The Draft EIR does not determine and has not designated any of the alternatives, including the Proposed Project, as the "Recommended Alternative." With the completion of the Final EIR, an alternative will be chosen and be presented to the Board of Supervisors as the Recommended Alternative. Any of the alternatives analyzed in the Draft EIR can be chosen as the Recommended Alternative.

ES-22 In the 3rd and 4th columns of Table ES-2, the following information has been added:

2 Configuration C	3 Configuration D (Environmentally Superior Alternative)	
Back basin provides management area that can only be maintained through mechanical excavation.	Limits excavation to two deeply excavated channels to provide more natural sediment movement and impact a smaller footprint	
3,615,000 cy Approximately 2 DDEs	3,588,000 cy Approximately Up to 2 DDEs	
4,000,000 cy	2,425,000 cy	
	Option 1	Option 2
83.96 ac	75.99 ac	70.81 ac
5 years	5 years	5 years
47.10 ac	50.78 ac	52.57 ac
1010'	1040'	1040'
Allow to regrow above 1010' and plant on side slopes above 1020'	Allow to regrow above 1040' and in the west leg. Keep invert of the east leg clear	Allow to regrow above 1040'. Replant above 1020' on the side slopes but keep invert clear

ES-22 In the footnotes of Table ES-2, the following addition has been made:

* Plus any additional sediment received during the project sediment removal phase

**** Project Goal is to restore the design capacity (volume for two DDEs below the spillway elevation of 1,040.5 feet) and establish a reservoir management system to maintain the flood control capacity of the reservoir.**

ES-23 In the 3rd line of Table ES-3, the following clarification has been made:

Air Quality	Less than Significant with Mitigation Significant and Unavoidable	Reduced	Increased	Reduced	Potentially Increased	Similar	Reduced
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ES-24 Figure ES-4 was revised to include the addition of Alternative 3, Configuration D, Option 2.

ES-25 Figure ES-5 was revised to include the addition of optional haul routes on Alternative 5, Haul Route Alternative.

Section 1.0 Introduction

Page Clarification/Revision

4 Beginning with the full 3rd bullet point on the page, the following edits have been made to 7 bullet points:

- Chapter 5: Other Mandatory CEQA Considerations – Includes a discussion of issues required by CEQA that are not covered in other chapters. This includes unavoidable adverse impacts, impacts found not to be significant, irreversible environmental changes, and growth inducing impacts.
- Chapter 6: References – Identifies the documents and individuals consulted in preparing the Draft EIR.
- Chapter 7: Report Preparation – Lists the individuals involved in preparing the Draft EIR.

- Chapter 8: Clarifications and Modifications – Identifies clarifications and revisions intended to update the Draft EIR in response to the comments received during the public review period.
- Chapter 9: Response to Comments – Provides the comments received during the public review period and the responses to those comments.
- Chapter 10: Mitigation Monitoring and Reporting Program

5 In the 2nd paragraph under 1.4 Areas of Controversy/Issues to Be Resolved, the following edit has been made:

A Notice of Preparation (NOP) and Initial Study (IS) was released on September 28, 2011 (Appendix A) and two Public Scoping meetings were held on October 5 and October 15, 2011. Comments received during a 45-day comment period were considered and incorporated into this document. ~~Two public scoping meetings were held for the Proposed Project, one on October 5, 2011, and one on October 15, 2011.~~ The scoping meeting introduced the Proposed Project, outlined the environmental review process for the EIR, and invited public comment on the scope and content of the EIR. Approximately 50 members of the public attended each meeting. Through this process, several key issues and areas of controversy were identified, including:

6 In the 2nd paragraph on the page, the following clarification has been made:

Another issue to be resolved involves the availability of dump trucks that meet EPA's emission standards for Model Year 2007 and later and the availability of off-road equipment that meets EPA's emission standards for ~~Tier 4~~ **Tier 3** equipment. This equipment would be required to conform to the mitigation measures proposed in Section 3.5 Air Quality; however, the availability of this equipment is unknown at this time.

Section 2.0 Project Description

Page Clarification/Revision

7 In the 2nd paragraph under 2.1.1 Location, the following clarifications have been made:

The Arroyo Seco watershed extends approximately ~~11 miles~~ **16 miles in length along the centerline of the watershed and 24 miles along the Arroyo Seco from its origin in the from the border of the Angeles National Forest to the it's the Arroyo Seco's confluence with the Los Angeles River.**

10 In the 1st paragraph under 2.1.4 LACFCD Devil's Gate Dam and Reservoir Easement, the following detail has been added:

Through easements granted in May of 1919 and March of 1965, the City of Pasadena granted the LACFCD, under a perpetual easement, the right to construct, reconstruct, inspect, maintain, repair, and operate Devil's Gate Dam, its spillway, **reservoir**, bypasses,

tunnels, and other support facilities as may be necessary for the construction and maintenance of a reservoir capable of impounding the waters of the Arroyo Seco for purposes of storage and control, and to control such waters as may be necessary in the prevention of damage by flood (City of Pasadena 1919/1965).

- 10 In the 1st paragraph under 2.1.6 Surrounding Land Uses, the following detail has been added:

The current leaseholders within Hahamongna Watershed Park include the Los Angeles County Fire Department (Fire Camp 2) and the Rose Bowl Riders, who sublet to the Tom Sawyer Camp **and MACH 1 (Move a Child Higher)**.

- 12 In the 1st paragraph on the page, the following modification has been made:

The Interim Measures Project (IMP) is currently underway to reduce downstream flood risk. The IMP includes dam modifications to ~~keep~~ **reduce the risk of** debris ~~from~~ plugging the outlet works and allow for the removal of up to 25,000 cy of sediment per year from the dam face until the Proposed Project is started. In 2011, approximately 13,000 cy were removed from the dam face and placed at Johnson Field. In 2012, approximately 1,525 cy of sediment and 419 cy of green waste were removed from the dam face and hauled to Johnson Field and Scholl Canyon Landfill, respectively. In 2013, 1,200 cubic yards of sediment and 12 to 14 loads of green waste were removed from the dam face and hauled to Johnson Field and Scholl Canyon Landfill, respectively.

- 12 After the 1st paragraph under 2.3 Project Need, the following information has been added:

The Los Angeles County Flood Control Act (Act) was adopted by the State Legislature in 1915 after a disastrous regional flood took a heavy toll on lives and property. The Act established the Los Angeles County Flood Control District (LACFCD) and empowered it to provide flood protection and water conservation within its boundaries.

A reservoir storage design capacity of two design debris events (DDEs) below the dam's lowest spillway was determined to be the standard acceptable level of risk at Devil's Gate Dam and Reservoir. The DDE volume of capacity is determined using the January 2006 County of Los Angeles Department of Public Works Hydrology Manual and the March 2006 County of Los Angeles Department of Public Works Sedimentation Manual.

LACFCD established the required design capacity at two DDEs to ensure that the reservoir always has sufficient capacity to maintain the level of downstream flood protection. By establishing the design capacity at two DDEs, the reservoir is likely to have sufficient capacity to experience a design level storm, or several smaller but significant debris events, and still maintain capacity of at least one DDE during the lengthy environmental and construction processes to remove the debris. Further, it should be noted that additional criteria in special circumstances related to dam safety may also dictate the need to remove sediment from a reservoir:

- **Depending on the structural stability of the dam, the height of sediment against the dam may need to be limited (sediment weighs more than water and increases the forces on the dam during an earthquake).**
- **The volume of sediment accumulation may also be limited to prevent sediment from blocking valves/operations (if the debris blocks the outlet valves, they cannot be used to regulate storm flows or to empty the dam during an emergency).**

Therefore, to minimize flood risk for Devil's Gate Dam and Reservoir, the required reservoir capacity is based on debris control and is 4.0 million cy (two DDEs) below the spillway elevation of 1,040.50 feet.

For more information on the DDE calculations, please review the Hydrology and Sedimentation Manuals at the following locations:

The Hydrology Manual (January 2006) can be viewed here:

http://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf

The Sedimentation Manual (March 2006) can be viewed here:

http://dpw.lacounty.gov/wrd/publication/engineering/2006_sedimentation_manual/Sedimentation%20Manual-Second%20Edition.pdf

- 14 In the 1st paragraph under Removal Method, the following clarifications have been made:

Historically, as storm events have deposited sediment in the reservoir, native and non-native vegetation have become established in the sediment. During subsequent storm events some of the vegetation and trees have been washed out by storm flows or submerged when the reservoir level rises, or buried under sedimentation. Despite the dynamic changes to water elevation and flows in the reservoir, mature black willow trees, Riversidean Alluvial Fan Sage Scrub, ~~Mule Fat Scrub~~ **Mule Fat Thickets**, and riparian vegetation have thrived in the reservoir. During storm events following the 2009 Station Fire, a large portion of the reservoir vegetation was buried in sediment; however, significant amounts of vegetation, including numerous mature willow trees, remain intact.

- 15 In the 1st paragraph under Sediment Disposal, the following details have been added:

Excavated sediment will be trucked offsite to existing disposal site locations which are currently available to accept the sediment. Trucks will travel and place sediment at one of the primary disposal site locations, the Waste Management Facility in Azusa, the Vulcan Materials Reliance Facility in Irwindale, or the Manning Pit Sediment Placement Site (SPS) in Irwindale. Secondary disposal sites are the facilities in Sun Valley (Sheldon Pit, Sun Valley Fill Site, Bradley Landfill, and Boulevard Pit). It is estimated that **over the life of the sediment disposal phase of the Proposed Project** the eastern disposal sites will be used from 80 to 100 percent of the time. Use of the Sun Valley sites is estimated

to occur from 0 to 20 percent of the time **over the duration of the sediment disposal phase**. Removed vegetation and organic debris will be hauled to Scholl Canyon Landfill located in the City of Glendale. It is estimated that for approximately three weeks during the first year of sediment removal, approximately 50 percent of the total trucking will be vegetation and organic debris hauled to Scholl Canyon Landfill; and the remaining 50 percent will be sediment distributed to the other sites. In the subsequent years of sediment removal, it is estimated that during the first week 25 percent of the total trucking will be vegetation and organic debris hauled to Scholl Canyon Landfill; and the remaining 75 percent will be sediment distributed to the other sites.

- 15 In the 6th, 7th, and 8th paragraphs under Sediment Disposal, the following clarifications have been made:

Sheldon Pit is an active operating gravel pit owned by Vulcan Materials Company. Hours of operation are 6:00 a.m. to 8:00 p.m., Monday to Saturday. It has no route or load restrictions (**Hall & Foreman, Inc. 2013b** ~~Vulcan Materials 2013~~). Located at the north end of the Sun Valley Watershed, the pit is bounded by Wentworth Street to the east, Glenoaks Boulevard to the southwest, Tujunga Wash to the northwest, and Hansen Dam Golf Course to the north.

Sun Valley Fill Site (also known as Cal-Mat and Glenoaks Landfill) occupies a 90-acre site bounded by Glenoaks Boulevard on the southwest, Wentworth Street on the northwest, Peoria Street on the southeast, and Dronfield Avenue on the northeast. Hours of operation are 6:00 a.m. to 8:00 p.m., Monday to Saturday. It has a load restriction of 300 trucks per day (**Hall & Foreman, Inc. 2013b** ~~Vulcan Materials 2013~~). Cal Mat Pit was an active gravel pit until the late 1980s. Since then it has been used as a landfill for inert construction debris including concrete, asphalt, rock, dirt, and brick. Vulcan Materials Company owns and operates Cal Mat Pit under a City of Los Angeles Environmental Affairs Department solid waste facilities permit (Number 19-AR-1160). A reclamation plan for Cal Mat Pit (~~Conrock and California Portland Cement 1977~~) has been approved by and is on file at the City of Los Angeles Department of City Planning (LADWP 2012).

Boulevard Pit, an active gravel pit is owned by Vulcan Materials Company. The pit is bounded by Branford Street to the north, San Fernando Road to the east, Sheldon Street to the south, and Laurel Canyon Boulevard to the west. Hours of operation are 6:00 a.m. to 8:00 p.m., Monday to Saturday. It has no route or load restrictions (**Hall & Foreman, Inc. 2013b** ~~Vulcan Materials 2013~~).

- 16 In the 1st paragraph under Project Site Access/Staging, the following revisions have been made:

Trucks will enter the reservoir via the upgraded reservoir access road located on the east side of the reservoir. After rehabilitation and minor improvements to the existing west side reservoir access road, trucks will exit the reservoir via this road. As part of the Proposed Project, the existing western access road and the upgraded eastern access road will be improved with new ramps to allow for truck traffic in and out of the reservoir. The eastern access road will allow for one-way truck traffic, and the western access road will allow for one-way truck traffic. The eastern access road will now allow

for traffic to enter the reservoir directly from Oak Grove Drive as opposed to using La Cañada Verdugo Road. The existing western access road is currently unpaved, and the portion of this access road from below the bike path to the reservoir will be widened but remain unpaved. The portion of this access road from Oak Grove Drive to the West Rim Trail bike path will need to be widened and paved. ***The sediment removal equipment will be staged within the Proposed Project site overnight, during sediment removal operations. No staging of sediment removal equipment will take place on city streets. Specifics of the staging area(s) will be dictated by the contractor but will follow all applicable RWQCB requirements. Sediment hauling trucks will be queued within the Proposed Project site during removal activities and will be stored offsite nightly by their respective operators. Empty trucks will be staged within the Proposed Project site.***

22 In the 1st and 2nd paragraphs under Section 2.5.2 Reservoir Management, the following information has been added:

The reservoir management phase of the Proposed Project is expected to start in 2020 after the completion of the ~~main~~ sediment removal phase. The Proposed Project is expected to result in a reservoir configuration and access to facilitate future routine annual management and sediment removal. After the initial proposed sediment removal activities, the reservoir will be managed through vegetation maintenance, sediment excavation/trucking offsite, and Flow-Assisted Sediment Transport (FAST). These activities will take place under one of the options described below. The purpose of the proposed annual management activities, described below, is to reduce buildup of sediment in the reservoir management area and eliminate or substantially reduce the need for large-scale sediment removal. It is estimated that ***typically an average of*** 13,000 cy of sediment will potentially be deposited in the reservoir annually after completion of the Proposed Project. The access roads will be maintained to provide proper road width for access.

Moderately large sediment deposits have the potential to occur during a storm season, but it is anticipated that even with this type of event the newly deposited sediment could be removed in one season. A moderately large sediment removal event, anticipated to involve around 170,000 cy, could take place over an estimated 12-week period during the late summer/early fall following the vegetation maintenance.

23 In the 2nd paragraph under Section 2.5.2 Reservoir Management, Sediment Excavation/Trucking Offsite the following information has been added:

It is estimated, based on past storm events, that sediment excavation/trucking offsite will be required to ***typically*** remove ~~average of~~ 13,000 cy of sediment annually. Based on an estimated removal of ***a maximum of*** 4,800cy per day, it is expected this will occur over an estimated two-week period, Monday through Friday. This removal activity will take place during the late summer/early fall following the vegetation maintenance. ***Removal of the sediment, vegetation, trees, and organic debris is expected to require an average of 50 truck round trips per hour, with an estimated 200 to a maximum of 300 truck round trips per day during excavation activities.***

27 In the 5th bullet point under Section 2.7 Best Management Practices the following clarification has been made:

- If the project may be active during **rain events**~~in the rainy season (October 15 through April 15)~~, the Contractor shall prepare an accumulated precipitation procedure (APP) for review and approval by the LACFCD Engineer before any discharge from the project. The APP shall describe the location of proposed discharges, the BMPs to prevent pollution, and the actual equipment to be used. The APP shall be prepared and submitted in accordance with BMP NS-2 and the LACDPW Construction Site BMPs Manual (BMP Manual) Section 7.

28 Under Section 2.8.3 Reviewing Agencies, the following clarifications have been made:

Regional Agencies

- Southern California Association of Governments (SCAG)
- South Coast Air Quality Management District (SCAQMD)
- ~~City of Pasadena~~
- ~~City of La Cañada Flintridge~~
- ~~City of Azusa~~
- ~~City of Irwindale~~
- ~~City of Los Angeles~~

Local Agencies

- **City of Pasadena**
- **City of La Cañada Flintridge**
- **City of Azusa**
- **City of Irwindale**
- **City of Los Angeles**

Section 3.4 Aesthetics

Page Clarification/Revision

50 After the 1st paragraph under 3.4.3 Applicable Regulations, the following edits and additions have been made:

City of Pasadena General Plan

The City of Pasadena General Plan **Land Use Element** Objectives and Policies pertaining to the Proposed Project are outlined below.

OBJECTIVE 9 – Open Space Preservation and Acquisition: Preserve and acquire open space in Pasadena in order to enhance the quality of Pasadena life.

Policy 9.5 – Stewardship of the Natural Environment: Encourage and promote the stewardship of Pasadena’s natural environment, including water conservation, clean air, natural open space protection, and recycling. Encourage the use of native, water conserving, and regionally appropriate landscaping.

The Green Space, Recreation and Parks Element (City of Pasadena 2007)

Policy 1.2 – Protect Open Spaces: Protect natural open areas, watersheds, and environmentally sensitive areas such as Hahamongna, Eaton Canyon, riparian areas, and other open spaces.

OBJECTIVE 2 – PRESERVATION AND PROTECTION OF THE ARROYO SECO AND ADJACENT OPEN SPACE AREAS: Recognize the importance to Pasadena of the history, cultural resources, and unique character of the Arroyo Seco, and conserve and enhance these assets.

Policy 2.1 – Arroyo Seco Planning: Fully implement all master plans and design guidelines for the Arroyo. This includes the Lower Arroyo Master Plan, the Hahamongna Watershed Park Master Plan, and the Central Arroyo Master Plan. (LUE Policy 9.2)

Policy 2.3 – Balance Recreation with Environmental Protection: Implement the Arroyo Seco Master Plans by balancing recreational opportunities with protection and restoration of the ecosystem, while recognizing the important existing water resources and flood management functions of the area.

Policy 2.4 – Promote multi-faceted use of the Arroyo: Through implementation of the Arroyo Seco Master Plans, continue to maintain and enhance the area as a prime resource for quality of life of Pasadena residents.

60 In the 4th paragraph under Reservoir Management, the following revision has been made:

Under Option 2, at the end of the sediment removal phase, implementation of Mitigation Measures MM BIO-6, MM BIO-7, and MM BIO-8 would involve habitat restoration and enhancement and tree replacement in the remaining approximately ~~28.7286-45~~ acres on the northern half of the reservoir.

64 In the 3rd paragraph under Reservoir Management, the following revision has been made:

Under Management Option 2, approximately 91.28 acres on the southern half of the reservoir will exhibit the annual changes from disturbed to low, dense Riparian Herbaceous vegetation; and habitat restoration and enhancement and tree replacement will take place in the remaining approximately ~~28.7286-45~~ acres on the northern half of the reservoir.

64 In the 2nd paragraph under Mitigation Measures, the following revision has been made:

For reservoir management under Option 2, at the end of the sediment removal phase, implementation of Mitigation Measures MM BIO-6, MM BIO-7, and MM BIO-8 would involve habitat restoration and enhancement and tree replacement in the remaining approximately ~~28.7286-45~~ acres on the northern half of the reservoir.

Section 3.5 Air Quality

Page Clarification/Revision

76 In the 3rd paragraph under Sensitive Receptors, the following detail has been added:

The Proposed Project is located adjacent to residential areas, and 10 schools are located within one-half mile: i.e., Crestview Preparatory, Franklin Elementary, Hillside School and Learning Center, Jackson Elementary, La Cañada High School (*includes La Cañada Junior High School*), *Child Education Center*, Nanny's Nursery, Odyssey Charter, and Woodbury Preschool Village.

85 In the 2nd paragraph of 3.5.6 Impacts and Mitigation, the following clarifications have been made:

Use of sediment removal dump trucks that meet EPA's emission standards for Model Year 2007 and use of off-road equipment that meets, at a minimum, EPA's emission standards for Tier 3 interim equipment, would result in a reduction of NO_x emissions to less than the SCAQMD Regional Threshold for NO_x. ~~Every effort will be made to strive for the newest vehicles/equipment reasonably available.~~ Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of NO_x emissions to less than the SCAQMD Regional Threshold for NO_x. **Therefore, impacts during sediment removal will be less than significant.**; ~~however, the actual vehicles/equipment used may not reach the levels required to reduce the NO_x emissions to a level of less than significant for the sediment removal phase. Therefore, the Proposed Project during sediment removal will not meet the first indicator.~~

85 In the 6th paragraph of 3.5.6 Impacts and Mitigation, the following clarifications have been made:

MM AQ-1: LACFCD shall require all construction contractors during the sediment removal phase of the Proposed Project to use **only as many** sediment removal dump trucks that meet EPA's emission standards for Model Year 2007 **or later as reasonably feasible**.

86 In the 8th paragraph of 3.5.6 Impacts and Mitigation, the following clarifications have been made:

Implementation of these mitigations would reduce the Proposed Project's combined NO_x emissions during the sediment removal phase; ~~however while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual~~

vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. ; therefore, this impact remains significant and unavoidable.

87 In Table 3.5-6, the following edits have been made:

Table 3.5-6: Unmitigated Sediment Removal Emissions

Category	Maximum Daily Emissions (lbs/d)				
	ROG	CO	NO _x	PM ₁₀	PM _{2.5}
Off-Road	7.54	33.99	55.18	2.87	2.87
On-Road Trucks	7.15	34.87	314.93	5.33	4.91
Onsite Idling	0.44	1.89	7.88	0.05	0.05
Employees	0.07	2.44	0.24	0.00	0.00
Fugitive	0.00	0.00	0.00	27.30	4.44
Project Maximum Daily	15.214.78	73.271.30	378.2370.30	13.70	8.70
SCAQMD Daily Threshold	75.00	550.00	100.00	150.00	55.00
Exceeds Threshold?	No	No	Yes	No	No

88 In the 1st and 2nd paragraphs under Off-Road, the following revisions have been made:

Reduction of impacts from off-road equipment usage during the sediment removal can be accomplished by requiring the Proposed Project Contractor to use only EPA **Tier 3** ~~Tier 4 interim~~ equipment. **Tier 3** ~~Tier 4 interim~~ emissions standards are addressed in 40 Code of Federal Regulations (CFR), Part 1039 which addresses new compression-ignition non-road (i.e., CARB off-road equivalent) engines. Standards were phased in for various power categories with the latest being effective in 2011.

The emission factor used to estimate off-road equipment in this AQR was obtained from tables presented in CalEEMod's User Guidelines and represents the statewide average of equipment for each category. The factors for Fleet Year 2015 most closely compare to an average fleet of Tier 2 equivalent equipment. Applying the percentage reductions from Tier 2 to **Tier 3** ~~Tier 4 interim~~ to the unmitigated emissions represented above reduces the NO_x emissions from the off-road component for the sediment removal phase of the Proposed Project (SCAQMD 2013).89 In the 12th paragraph of AIR QUALITY-2, the following clarifications have been made:

As shown in Table 3.5-7 below, use of sediment removal dump trucks that meet EPA's emission standards for Model Year 2007 and use of off-road equipment that meets, at a minimum, EPA's emission standards for **Tier 3** ~~Tier 4 interim~~ equipment would result in a reduction of the Proposed Project's combined NO_x emissions during the sediment removal to less than the SCAQMD Regional Threshold for NO_x. ~~Every effort will be made to strive for the newest vehicles/equipment reasonably available.~~ Implementation of

Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of NO_x emissions; ~~however, the actual vehicles/equipment used may not reach the levels required to~~ **and will** reduce the NO_x emissions to a level of less than significant for the sediment removal phase.

89 In Table 3.5-7, the following edits have been made:

Table 3.5-7: Sediment Removal Emissions with Model 2007 Sediment Removal Trucks and ~~Tier 3~~ Tier 4 Interim Off-road Equipment

Category	Maximum Daily Emissions (lbs/d)				
	ROG	CO	NO _x	PM ₁₀	PM _{2.5}
Off-Road	4.71 20	33.99	22.05 21.88	2.60 2.22	2.15 2.22
On-Road Trucks	7.15	34.87	18.90	1.07	0.98
Onsite Idling	0.44	1.89	2.48	0.01	0.01
Employees	0.07	2.44	0.24	0.00	0.00
Fugitive	0.00	0.00	0.00	5.46	0.89
Project Maximum Daily	12.41 12.47	73.27 71.32	81.74 71.05	10.56 8.80	5.22 4.10
SCAQMD Daily Threshold	75.00	550.00	100.00	150.00	55.00
Exceeds Threshold?	No	No	No	No	No

89 In the 1st paragraph under Reservoir Management, the following changes have been made:

Emissions will be related to the off-road equipment used for reservoir management under both options, including four front loaders with 2-cubic-yard buckets, one bulldozer, an excavator, a grader, water truck, and sorters/crushers. Removal of the sediment, vegetation, trees, and organic debris is expected to require an estimated **200 to a** maximum of ~~2~~ **300** truck trips per day. It is estimated that during the first week approximately 25 percent of the debris will be green waste trucked to the Scholl Canyon Landfill, and the remaining 75 percent of trucking will be sediment distributed to the other sites. During reservoir management it is estimated that for the total trips, 2 percent will go to Scholl Canyon Landfill, 75 percent will go to the Irwindale sites, and 23 percent will go to the Sun Valley sites. **Reservoir management activities will use only disposal trucks that meet EPA's emission standards for Model Year 2007 or later and Tier 3 or higher equipment.**

91 In Table 3.5-8, the following edits have been made:

Table 3.5-8: Unmitigated Reservoir Management Activity*

Category	Maximum Daily Emissions (lbs/d)				
	ROG	CO	NO _x	PM ₁₀	PM _{2.5}
Off-Road	2.863 14	17.291 6.57	19.26	0.982	0.982
On-Road Trucks	2.821 7	17.471 2.16	40.567 4.62	1.701 1.13	1.561 0.4
Onsite Idling	0.20	0.89	1.17	0.00	0.00
Employees	0.02	0.76	0.07	0.00	0.00
Fugitive	0.00	0.00	0.00	3.30	0.75
Project Maximum Daily	5.905	36.4024	61.1940.00	10.5540	3.3280
SCAQMD Daily Threshold	75.00	550.00	100.00	150.00	55.00
Exceeds Threshold?	No	No	No	No	No

** Reservoir management activities will use only disposal trucks that meet EPA's emission standards for Model Year 2007 or later and Tier 3 or higher equipment.*

91 In the 20th paragraph of AIR QUALITY-2, the following clarifications have been made:

Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 would reduce the Proposed Project's combined NO_x emissions during the sediment removal phase; however, while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.

92 In the 5th paragraph of AIR QUALITY-3, the following clarifications have been made:

The analysis in Air Quality-2 demonstrated that during sediment removal, the significance threshold would not be exceeded for emissions of particulate matter and CO; and no significance threshold would be exceeded during reservoir management under either option. Nevertheless, while every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable. **Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of NO_x emissions and will reduce the NO_x emissions to a level of less than significant for the sediment removal phase.**

92 In the 7th paragraph of AIR QUALITY-3, the following clarifications have been made:

Implementation of Mitigation Measures MM AQ-1 and MMAQ-2 would reduce the Proposed Project's combined NO_x emissions during the sediment removal phase; ~~however, while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~

96 In the 1st paragraph under AIR QUALITY-6, the following clarifications have been made:

The Proposed Project would generate air pollutant emissions from construction over a five-year period. Cumulative projects that could contribute to cumulative air quality impacts would be the cumulative projects that could be under construction during the same time period (Hahamongna Watershed Park MBMU Project, Metro Gold Line Foothill Extension, Arroyo Seco Canyon Project, and Devil's Gate Water Conservation Project). Each of the cumulative projects would have construction emissions contributing to existing air quality violations. All projects would be required to comply with the SCAQMD's air pollution control measures and rules. Implementation of these measures would reduce air emissions. ~~As discussed above, the Proposed Project emissions of VOC, PM₁₀, and PM_{2.5} are not expected to result in a cumulatively considerable net increase of any criteria pollutants for which the project region is non-attainment with the exception of NO_x emissions which may remain significant for sediment removal activity. While every effort will be made to strive for the newest vehicles/equipment, the actual Proposed Project vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, the Proposed Project's contribution to cumulative impacts associated with NO_x emissions remains significant and unavoidable.~~

96 In the 3rd paragraph of AIR QUALITY-6, the following clarifications have been made:

Implementation of these mitigations would reduce the Proposed Project's combined NO_x emissions during the sediment removal phase; ~~however, while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~

Section 3.6 Biological Resources

Page Clarification/Revision

97 In the 1st paragraph under Vegetation, the following clarifications have been made:

At the time of the 2010 survey (Chambers Group 2010a), the Proposed Project site was primarily composed of riparian and upland communities (see Figure 3.6-1: Devil's Gate Vegetation Communities (2010)). The Proposed Project site was resurveyed in 2013

(Chambers Group 2013) and is shown to be primarily composed of riparian and **non-native, weedy ruderal** communities plus large scoured areas created as a consequence of the 2009 Station Fire (see Figure 3.6-2: Devil's Gate Vegetation Communities (2013)). Further descriptions of the Proposed Project site are listed below.

98 Figure 3.6-1 was revised to reflect changes to the naming of vegetation communities.

99 Figure 3.6-2 was revised to reflect changes to the naming of vegetation communities.

100 In Table 3.6-1, the following clarifications have been made:

Vegetation Community	2013 Survey Acreage
RIPARIAN	
Mule Fat Scrub Mule Fat Thickets	9.3 11.1
Riparian Herbaceous	1.8
Riparian Woodland (Black Willow Series)	51.4
UPLAND	
California Sagebrush – California Buckwheat Scrub	3.1
Coastal Sage Scrub	
Riversidean Alluvial Fan Sage Scrub	1.1
OTHER	
Mustard and Annual Brome Semi-Natural Herbaceous Stand	22.8
Ruderal	
Escaped Cultivars Ornamental Landscaping	0.4
Disturbed (Barren/Trails)	1.9
Scoured	26.5

100 In the 1st paragraph under Riparian Communities, the following clarifications have been made:

Black Willow Series, as described by Sawyer *et al.* and Keeler-Wolf (1995~~2009~~), exists when black willow (*Salix gooddingii*) is the sole dominant shrub or tree in the canopy. This community occurs in habitats seasonally flooded and saturated with freshwater. This community occurs in floodplains along rivers and streams and on the edges of meadows. Species that usually occur with black willow include California sycamore (*Platanus racemosa*), coyote brush (*Baccharis pilularis*), Fremont cottonwood (*Populus fremontii*), blue elderberry (*Sambucus nigra* subsp. *caerulea*), mule fat (*Baccharis salicifolia* **subsp. salicifolia**), white alder (*Alnus rhombifolia*), and other willows (*Salix* sp.).

101 In the 4th through 7th paragraphs under Riparian Communities, the following clarifications have been made:

~~Mule Fat Scrub~~ **Mule Fat Thickets**

Mule Fat Thickets, as described by Sawyer et al. (2009), exists when mule fat is the sole or co-dominant shrub in the canopy. Shrubs are less than 16 feet (5 meters) in

height and the canopy is continuous with two tiers. One tier can reach up to 6 feet in height. The second tier can reach up to 16 feet in height. The herbaceous layer is sparse. This community typically occupies canyon bottoms, floodplains, irrigation ditches, lake margins, and stream channels. Soils are mixed alluvium. Other species associated with this community may include California sagebrush (*Artemisia californica*), coyote brush, laurel sumac (*Malosma laurina*), blue elderberry, and other willow species.

~~Mule Fat Scrub consists of dense stands of mule fat with lesser amounts of willow species. This community type is classified as a mixed evergreen deciduous shrubland with a continuous canopy and a sparse understory. This community typically occupies intermittent streambeds and seeps and occurs at elevations ranging from sea level to 4,100 feet above mean sea level (amsl) (Holland 1986; Gray and Bramlet 1992).~~

~~The **Mule Fat Thickets** Mule Fat Scrub community was ~~were~~ present in the Proposed Project site during both surveys. The native plant species found included mule fat and black willow. Non-native species found within this community in the Proposed Project site include Italian thistle (*Carduus pycnocephalus*), poison hemlock (*Conium maculatum*), and short-pod mustard(*Hirschfeldia incana*).~~

~~Riparian Herbaceous~~

~~Riparian Herbaceous vegetation is an early successional stage of willow scrub and riparian forest communities. Flooding (or other disturbance factors) often scours woody riparian vegetation away, and the site is rapidly colonized by pioneer wetland herbaceous plants (Gray and Bramlet 1992).~~

Portions of the habitat mapped as Mule Fat Thickets are represented by an early successional stage of the thicket. In 2010, sparse riparian vegetation was present in the northern half of the Proposed Project site, while in 2013, this type of vegetation was concentrated only near the face of the dam. Native plant species found in this early seral stage include young seedlings and saplings of mule fat, black willow, and red willow. Non-native plant species associated with the early successional stage of this community include curly dock (*Rumex crispus*), wild radish (*Raphanus sativus*), and short-pod mustard.

~~In 2010, sparse Riparian Herbaceous vegetation was present in the northern half of the Proposed Project site. In 2013, Riparian Herbaceous vegetation was found near the face of the dam. Native plant species found in this community include mule fat, black willow, and red willow. Non-native plant species in this community include curly dock (*Rumex crispus*), wild radish (*Raphanus sativus*), and short-pod mustard.~~

102 In the 1st through 5th paragraphs under Upland Communities, the following clarifications have been made:

Upland Communities

Riversidean Alluvial Fan Sage Scrub

Riversidean Alluvial Fan Sage Scrub occurs in alluvial fans as well as in washes and is a subtype of Riversidean Coastal Scrub (Holland 1986) **or referenced as Scalebroom Scrub by Sawyer et al. (2009)**. Three stages of alluvial fan scrub succession are described by Smith (1980), with density and species diversity varying in direct relationship to the frequency of water scouring each stage receives. Older stages of alluvial scrub are located on high benches and have not been subjected to a recent major flood event. This mature stage can be identified by the presence of larger shrubs, an increase in species diversity, and a groundcover of organic material and annual grasses. Many large shrubs over 10 feet in height are found in the mature community, including laurel (*Malosma laurina*). The intermediate and early stages are located on lower benches closer to the active flood plain and have been subjected to relatively recent flooding events. Intermediate and early stages are progressively more open and less diverse. Medium-sized shrubs up to 4 feet in height can be found in intermediate stage areas, while early stage shrubs are rarely greater than 2 feet in height. Organic material and annual grasses are much less common in intermediate areas and are almost absent in early stages. Scale-broom (*Lepidospartum squamatum*), considered to be an indicator species of alluvial scrub communities, is present in most alluvial scrub communities.

In 2010, Riversidean Alluvial Fan Sage Scrub was present on the northeast portion of the Proposed Project site. Much smaller patches of this community remain in 2013. The reduction in habitat is due to post-fire sediment accumulation. As discussed previously, the significant sediment loading occurring as a result of the 2009 Station Fire has greatly reduced the size of this community and has ~~permanently~~ inhibited its ability for succession.

Plant species found in the Proposed Project site include scale-broom, California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), deerweed (*Acmispon glaber*[*Lotus scoparius*]), our Lord's candle (*Yucca whipplei*), and coastal prickly pear (*Opuntia littoralis*).

~~California Sagebrush – California Buckwheat Scrub-Coastal Sage Scrub~~

~~Coastal Sage Scrub communities are open and typically dominated by California sagebrush and California buckwheat, where each attains at least 20 percent cover (Holland 1986). This community usually occurs on steep slopes with severely drained soils or clays that release stored soil moisture slowly. Coastal Sage Scrub may intergrade with other southern California chaparrals at higher elevations. In addition to California sagebrush and California buckwheat, other species present within this community include coyote brush and **Coastal Sagebrush – California Buckwheat Scrub, as described by Sawyer et al. (2009), exists when both California sagebrush and California buckwheat are codominant in the shrub canopy. Most shrubs are less than 6 feet in height, and some are less than 16 feet in height. The canopy is two-tiered and intermittent to continuous. The herbaceous layer is seasonally present. This community occurs on steep, south-facing slopes with colluvial soils. Other species that may occur within this community include coyote brush, laurel sumac, and black sage (Salvia mellifera).**~~

In 2010, large patches of ~~Coastal Sage Scrub~~ **California Sagebrush – California Buckwheat Scrub** surrounded the riparian habitat in the northern portion of the Proposed Project site. These patches have been largely replaced with scoured areas. As with the Riversidean Alluvial Fan Sage Scrub, only much smaller patches of ~~Coastal Sage Scrub~~ **California Sagebrush – California Buckwheat Scrub** remain in 2013. As discussed previously, the recent significant sediment loading experienced in the Reservoir has greatly reduced the size of this community and has permanently inhibited its ability for succession.

104 In the 8th and 9th paragraphs under Other Communities, the following clarifications have been made:

~~Ornamental Landscaping~~ **Escaped Cultivars**

~~Ornamental Landscaping~~ **Escaped cultivars** includes areas where the vegetation is dominated by non-native horticultural plants (Gray and Bramlet 1992) **that have been purposely planted for aesthetic reasons. Often, these horticultural/cultivated plants escape the garden environment and can become established in the natural setting.** Typically, the species composition consists of introduced trees, shrubs, flowers, and turf grass. Several areas within the Proposed Project site have **escaped cultivars as the dominant vegetation type present** ~~Ornamental Landscaping~~.

Several small patches of ~~ornamental landscaping~~ **escaped cultivars** persist in 2013 (compared to the 2010 survey), but the overall acreage has decreased from 1.44 acres to 0.4 acre dispersed throughout the project site.

~~Mustard and Annual Brome~~ **Semi-Natural Herbaceous Stand** ~~Ruderal~~

This herbaceous stand is dominated by a composition of non-native short-pod mustard (*Hirschfeldia incana*) and non-native annual brome grasses (*Bromus* spp.). Other non-native annual species within this community include red-stemmed filaree (*Erodium cicutarium*) and bristly ox-tongue (*Helminthotheca echioides*). Herbs are less than 6 feet in height and the canopy is continuous. This community responds positively to frequent disturbance and competes with native vegetation (Sawyer et al. 2009). Each of these species has a California Invasive Plant Inventory (Cal-IPC) ranking indicating they have the potential to threaten California wildlands and ecologically impact the physical processes, plant and animal communities, and vegetation structure (Cal-IPC 2006). The presence of non-native plant species in a given area can ultimately lead to a reduction in the diversity of wildlife that use the area for foraging and refuge.

Classified as Ruderal in 2010, this community has been updated to reflect a preference by the Resource Agencies to use Alliance code per Sawyer et al. (2009). The amount of non-native weedy vegetation onsite has increased from 7.64 acres in 2010 to approximately 22.8 acres in 2013 due to frequent disturbance from sedimentation and erosion during storm events.

~~Ruderal vegetation communities are dominated by non-native, weedy species that are adapted to frequent disturbances and compete with native vegetation. Soils in ruderal~~

areas are also typically characterized as heavily compacted. Species observed in this community typically include: brome grasses (*Bromus* spp.), red stemmed filaree (*Erodium cicutarium*), short pod mustard, and bristly ox tongue (*Helminthotheca echioides*). The emergence of non natives will lower the diversity of plants within a community, lower the diversity of wildlife that could potentially use the area for foraging and refuge, and contribute to an overall decrease in habitat value.

104 In the 12th through 15th paragraphs under Other Communities, the following clarifications have been made:

Poison Hemlock Patches (Semi-Natural Stands) Series

Poison Hemlock ***Patches Series*** is area vegetation community dominated by the herbaceous, weedy species poison hemlock. This biennial plant typically grows up to 10 feet in height and occurs in moist, especially disturbed places at elevations generally less than 3,280 feet (**Baldwin et al. 2009**)(Hickman 1993).

In 2010, Poison Hemlock ***Patches were Series*** was present within the watershed near the center of the Proposed Project site. This series was not identified during the 2013 survey and is likely buried by sediment.

Perennial Pepper Weed Patches (Semi-Natural Stands) Peppergrass Series

Perennial Pepper Weed Patches are Peppergrass Series is a vegetation community dominated by the herbaceous, weedy species peppergrass (*Lepidium latifolium*).

In 2010, ***Perennial Pepper Weed Patches were Peppergrass Series*** was present within the watershed near the center of the Proposed Project site. This series was not identified during the 2013 survey and is likely buried by sediment.

105 In the 1st paragraph under Amphibians and Reptiles, the following clarifications have been made:

Fourteen amphibian and reptile species were observed or detected in the Proposed Project area during the surveys. Species included the California toad (*Anaxyrus boreas halophilus*), western toad (*Bufo boreas*), American bullfrog (*Lithobates catesbeianus*), Baja California treefrog (*Pseudacris hypochondriaca hypochondriaca*), California treefrog (~~*Hyla*~~ ***Pseudacris cadaverina***), San Diego alligator lizard (*Elgaria multicarinata webii*), common side blotch lizard (~~*Uta stansburiana*~~), western side-blotched lizard (*Uta stansburiana elegans*), Great Basin fence lizard (*Sceloporus occidentalis longipes*), western whiptail (~~*Aspidoscelis tigris*~~), coastal whiptail (*Aspidoscelis tigris stejnegeri*), two-striped garter snake (*Thamnophis hammondi*), California kingsnake (*Lampropeltis getula californiae*), and ~~Great Basin~~ **San Diego** gopher snake (*Pituophis catenifer annectens deserticola*).

106 In Table 3.6-2, the following clarification has been made:

Species	Status	Habitat	Potential for Occurrence
Plummer's mariposa lily (<i>Calochortus plummerae</i>)	CNPS Rare Plant Rank: 1B4.2	Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, and valley and foothill grasslands.	Not observed during survey. Potential habitat exists but not observed during survey. Considered absent from site.

109 In the 1st paragraph under Special Status Animal Species, the following clarifications have been made:

After a literature review and an assessment of the various habitat types in the vicinity of the Proposed Project site, it was determined that ~~415~~ sensitive wildlife species have the potential to occur within the Proposed Project site or were present in the Proposed Project site during the survey. Factors used to determine potential for occurrence include quality of habitat, impact of surrounding residential development, and the date and location of prior California Natural Diversity Database (CNDDDB) records of occurrence. These special status animal species and their status are listed in Table 3.6-3.

109 In Table 3.6-3, the following clarifications have been made:

Species	Status	Potential for Occurrence
AMPHIBIANS		
Sierra Madre yellow-legged frog (<i>Rana muscosa</i>)	SSC	Low potential to occur due to lack of known historical occurrences within 5 miles of Proposed Project site but not observed during survey.
coast range newt (<i>Taricha torosa torosa</i>)	SSC	High potential for occurrence, due to the presence of suitable habitat and occurrences within 5 miles of the Proposed Project site but not observed during survey.
REPTILES		
coast horned lizard (<i>Phrynosoma blainvillii</i>)	SSC	Low potential to occur due to lack of known historical occurrences within 5 miles of Proposed Project site but not observed during survey.
coast patch-nosed snake	SSC, FSC	Present within the Proposed Project site.
southwestern pond turtle (<i>Actinemys marmorata</i>)	SSC	Moderate potential for occurrence, due to the presence of suitable habitat but not observed during survey.
two-striped garter snake (<i>Thamnophis hammondi</i>)	SSC	Present within Proposed Project site.

Species	Status	Potential for Occurrence
BIRDS		
burrowing owl (<i>Athene cunicularia</i>)	SSC	Low potential to occur due to lack of known historical occurrences within 5 miles of Proposed Project site but not observed during survey.
southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	FE, SE	Low potential to occur due to lack of known historical occurrences within 5 miles of Proposed Project site but not observed during survey.
least Bell's vireo (<i>Vireo bellii pusillus</i>)	FE, SE	Present but not nesting within Proposed Project site.
yellow warbler (<i>Dendroica petechia brewsteri</i>)	SSC (nesting)	Present but not nesting within Proposed Project site.

110 In the first full paragraph on the page, the following clarifications have been made:

~~Three~~ **Six** sensitive wildlife species have a moderate to high potential to occur in the Proposed Project site. One species, least Bell's vireo, is a federally and state listed as endangered species and was present on the site during protocol surveys. Two species, western pond turtle and coast range newt, are California State Species of Special Concern (SSC) and have a moderate or high potential to occur on the site. One species, yellow warbler, is a SSC when nesting and was present on the site during the reconnaissance survey. A two-striped garter snake was observed on the dirt road leading to the spillway. **The coast patch-nosed snake, a SSC and Federal Species of Concern (FSC), was present during one of the vireo surveys.**

111 In the 3rd full paragraph on the page, the following clarification was made:

Approximately 62.5 acres of suitable habitat (Riparian Woodland, ~~Mule Fat Scrub, Riparian Herbaceous habitat~~ **and Mule Fat Thickets**) for least Bell's vireo are present within the Project site. Historic records do not exist within the *Pasadena*, California USGS 7.5-minute topographic quadrangle; however, known occurrences do exist for this species in the San Gabriel Mountains in Los Angeles County. Because habitat for this species occurs in the Survey Area and occurrences are known in other areas of the San Gabriel Mountains, focused protocol-level least Bell's vireo surveys were conducted from May through August 2010 and from April through July 2013 following modified USFWS *Least Bell's Vireo Survey Guidelines* (Jan. 19, 2001). No least Bell's vireos were observed during the 2010 surveys. In July 2012, an adult and a juvenile least Bell's vireo were observed in the Proposed Project site (CDFW 2013). Because least Bell's vireo have high site fidelity, and are likely to return to the same site to breed every year, focused surveys for least Bell's vireo were conducted in 2013 to determine if they are breeding within the Project site. A single male least Bell's vireo was observed during the first four of six 2013 surveys (April 29, May 23, June 5, and June 17, 2013). The least Bell's vireo male was extremely vocal, continuously singing throughout the mornings, and appeared to be very territorial. It did not appear to be paired, however, and no nesting behavior was observed. Shortly before the June 17, 2013, survey, recreational activities within the

Proposed Project site increased dramatically due to the initiation of children's summer camps within Hahamongna Watershed Park and the flood control reservoir. Camp activities included clearing vegetation for children's play areas within the Riparian Woodland, cutting new trails through the occupied least Bell's vireo habitat, and increasing sound disturbance within the occupied least Bell's vireo habitat. The least Bell's vireo was no longer observed during the June 27 or July 9, 2013, surveys; however, due to Bell's vireo having high site fidelity, this species is considered present within the Proposed Project site.

- 112 In the 1st paragraph under Coast Range Newt - SSC, the following clarification was made:

The coast range newt is a California Species of **Special** Concern found in terrestrial habitats such as grasslands, woodlands, and forests.

- 112 After the 1st paragraph on the page, the following information has been added:

Coast Patch-nosed Snake – SSC, FSC

This species is a California Species of Special Concern and Federal Species of Concern. This species occurs in California from San Luis Obispo County, along the coast west of the deserts, and into northern coastal Baja California (California Reptiles and Amphibians 2009). This species is a generalist in diet and habitat. It inhabits coastal chaparral in canyons, rocky hillsides, sandy flats, and plains. This species is diurnal and can be found throughout the day in milder temperatures, with greatest activity occurring in May and June, and basking in early morning or late day in hotter temperatures in the summer. This species can move quickly and may climb shrubs in pursuit of prey (California Reptiles and Amphibians 2009). This species has acute vision and can escape quickly if threatened and will also burrow into loose soil.

This species is considered uncommon in the area. Little is known about its natural history. Habitat destruction including development and grazing is the primary threat to this species.

Southwestern Pond Turtle- SSC

This species is a California Species of **Special** Concern. This species occurs along the west coast of North

- 113 In the 1st paragraph under Yellow Warbler (*Dendroica petechia brewsteri*) - SSC, the following information has been added:

The yellow warbler (nesting) is a California Species of **Special** Concern. Its breeding range includes most of North America from northern Alaska and northern Canada to the southern U.S. and Mexico.

- 114 In the 1st paragraph under Two-Striped Garter Snake, the following information has been added:

The two-striped garter snake is a California Species of **Special** Concern.

118 In the 3rd paragraph under Jurisdictional Waters/Wetland Habitats, the following clarifications have been made:

As described above, vegetation in the Proposed Project site has mature riparian trees, pockets of **Mule Fat Thickets, and Mule Fat Scrub**, freshwater marshes, ~~and emergent Riparian Herbaceous communities~~ growing along scoured areas present due to unstable sediment accumulation and subsequent scouring during storm events occurring since the 2009 Station Fire. Upland vegetation communities and developed areas also exist within the Proposed Project site.

125 After the 1st paragraph under Local, the following information has been added:

The City of Pasadena adopted the City Trees and Trees Protection Ordinance in May 2002, ~~and~~ amended its standards to include a total of 158 species in June 2003, **and also amended in January 25, 2010**. The ordinance seeks to protect public trees, landmark trees, native trees, and specimen trees in certain parts of the City and requires protection measures for new projects to avoid negative impacts that may occur during construction. A permit is required to remove or injure any tree protected under this ordinance, and one of the following findings must be made:

- There is a public benefit or public health safety or welfare benefit to the injury or removal that outweighs the protection of the tree; or
- The present condition of the tree is such that it is not reasonably likely to survive; or
- There is an objective feature of the tree that makes the tree not suitable for the protection of this chapter; or
- There would be a substantial hardship to a private property owner in the enjoyment and use of real property if the injury or removal is not permitted; or
- To not permit injury to, or removal of a tree, would constitute a taking of the underlying real property; or
- The project includes a landscape design plan **that emphasizes a tree canopy that is sustainable over the long term by adhering to the replacement matrix adopted by resolution of the city council and included in the associated administrative guidelines** ~~which would result in tree canopy coverage of greater significance than the one removed within a reasonable time after completion of the project.~~

The Los Angeles County Flood Control District was created by State legislation to implement the State-designated objectives of flood control and water conservation within the boundaries of the District. When implementing these State-designated

objectives, the District is not subject to local ordinances like the City's Trees and Tree Protection Ordinance.

The purpose of the Proposed Project is to restore and maintain flood capacity at the Devil's Gate Reservoir, which would directly further the District's regional flood control objective. Accordingly, the Proposed Project would not be subject to the provisions of the Pasadena City Trees and Tree Protection Ordinance.

129 In the 2nd paragraph under Sensitive Wildlife, the following clarification has been made:

The least Bell's vireo is a federal and state listed endangered species. This species has been observed on the Proposed Project site and is considered present. Sediment removal activities will result in the removal of least Bell's vireo habitat within the Riparian Woodland and ~~Mule Fat Thickets~~-Mule Fat Scrub communities.

130 In the 1st paragraph under Reservoir Management, the following clarification has been made:

The reservoir management areas for both management options are expected to be composed of Riparian Herbaceous and **Mustard and Annual Brome Semi-Natural Herbaceous Stand** ~~Ruderal~~ communities (see Figure 3.6-5 Vegetation Communities Conditions during Reservoir Management Option 2). As described in Section 2.5, Reservoir Management Option 1 will involve the whole Proposed Project site and Reservoir Management Option 2 will involve approximately 91 acres.

130 In the 1st paragraph under Mitigation Measures, the following details have been added:

MM BIO – 1: A qualified biological monitor shall be present during initial ground- or vegetation-disturbing project-related activities **to provide protection measures and monitor for wildlife in harm's way. This includes initial ground- or vegetation-disturbing project-related activities at the annual start of each year of sediment removal or maintenance activities.** Following initial project-related activities, a qualified monitoring biologist shall be present as necessary to maintain the implemented protection measures and monitor for additional species in harm's way. **These protection measures shall include, as appropriate: redirecting the wildlife, identifying areas that may require exclusionary devices (e.g., fencing), or capturing and relocating outside the work area. Any captured species shall be relocated to adjacent appropriate habitat that is contiguous to adjacent habitat and not impacted by project-related disturbance activities.**

131 Figure 3.6-5 was revised to reflect changes to the naming of vegetation communities.

132 In the 3rd paragraph under Mitigation Measures, the following detail has been added:

MM BIO – 3: Within 90 days prior to ground-disturbing activities, a preconstruction survey shall be conducted by a qualified biologist for the presence of any sensitive species in harm's way, including coast range newt, the southwestern pond turtle, and the two-striped garter snake. If sensitive species are observed in harm's way, the

qualified biologist will develop and implement appropriate protection measures for that species. These protection measures shall include, as appropriate, redirecting the species, ~~constructing construction of~~ exclusionary devices (e.g., fencing), or **capturing capture and relocating relocation wildlife** outside the work area. Preconstruction surveys shall be repeated annually for the duration of the sediment removal. **Observations of special status species made during these surveys shall be recorded onto a CNDDDB field data sheet and submitted to CDFW for inclusion into the CNDDDB.**

132

In the 7th paragraph under Mitigation Measures, the following details have been added:

MM BIO – 5: Within 30 days prior to commencement of vegetation or structure removal activities, a preconstruction bat survey shall be conducted by a qualified biologist for the presence of any roosting bats. **Acoustic recognition technology shall be used if feasible and appropriate.** If either a bat maternity roost or hibernacula (structures used by bats for hibernation) are present, a qualified biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. These protection measures shall include, as appropriate, safely evicting non-breeding bat hibernacula, establishment of avoidance buffers, or replacement of roosts at a suitable location. **These measures shall also include as appropriate:**

- **To the extent feasible, trees that have been identified as roosting sites shall be removed or relocated between October 1 and February 28.**
- **When trees must be removed during the maternity season (March 1 to September 30), a qualified bat specialist shall conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.**
- **Trees identified as potentially supporting an active nursery roost shall be inspected by a qualified biologist no greater than 7 days prior to tree disturbance to determine presence or absence of roosting bats.**
- **Trees determined to support active maternity roosts will be left in place until the end of the maternity season (September 30).**
- **If bats are not detected in a tree, but the qualified biologist determines that roosting bats may still be present, trees shall be removed as follows:**
 - **Pushing a tree down with heavy machinery instead of felling the tree with a chainsaw**
 - **First pushing the tree lightly 2 to 3 times with a pause of 30 seconds between each nudge to allow bats to become active, then pushing the tree to the ground slowly**
 - **Allowing the tree to remain in place for 24 to 48 hours until inspected by the qualified biologist for presence or absence of roosting bats**

- **The qualified biologist shall document all bat survey, monitoring, and protection measure activities and prepare a summary report for LACFCD.**

133 In the 2nd paragraph under BIOLOGY-2, the following clarifications have been made:

The Proposed Project would impact approximately 51.4 acres of Riparian Woodland and ~~11.1~~ **9.3** acres of ~~Mule Fat Scrub~~ **Mule Fat Thickets** within the Proposed Project site. Riparian Woodland and ~~Mule Fat Scrub~~ **Mule Fat Thickets** are rare plant communities and provide nesting habitat for riparian species; impacts to these habitats would result in a significant impact. To minimize impacts due to the loss of Riparian Woodland and ~~Mule Fat Thickets~~ ~~Mule Fat Scrub~~, Mitigation Measures MM BIO-7 and MM BIO-8 have been provided.

134 In Table 3.6-4, the following clarifications have been made:

Table 3.6-4: Jurisdictional Acreage Matrix

Authority	Jurisdictional Area		Total Jurisdiction (acres)
USACE	Riparian Area outside Wetland Area	54.33	101.13
	Wetland Area	11.2	
	Drainage Impacts	35.6	
	Main channel	6.7	
	Braided channel	28.9	
RWQCB	Riparian Area Outside Wetland Area	2,366,614.8 (sq. ft.)	4,405,222.8 (sq. ft.)
	Mule Fat Thickets	406,414.8 (sq. ft.)	
	Mule Fat Scrub	405,108 (sq. ft.)	
	Riparian Herbaceous	1,306.8 (sq. ft.)	
	Riparian Woodland	1,960,200 (sq. ft.)	
	Wetland Area	487,872 (sq. ft.)	
CDFW	Drainage Impacts	1,550,736 (sq. ft.)	101.13
	Main channel	291,852 (sq. ft.)	
	Braided channel	1,258,884 (sq. ft.)	
	Riparian Area Outside Wetland Area	54.43	
CDFW	Mule Fat Thickets Mule Fat Scrub	9.33	101.13
	Riparian Herbaceous	0.03	
	Riparian Woodland	45.0	
	Wetland Area	11.2	
CDFW	Drainage Impacts	35.6	101.13
	Main channel	6.7	
	Braided channel	28.9	

135 In MM BIO-8, the following clarifications have been made:

MM BIO – 8: A combination of onsite and offsite habitat restoration, enhancement, and exotic removal shall be implemented by LACFCD at a 1:1 ratio for impacted sensitive habitat and jurisdictional waters. Habitat restoration/enhancement shall include use of willow cuttings and exotic species removal. ~~Non-native, weedy Ruderals~~ habitats within the basin shall be utilized whenever possible as mitigation sites. This mitigation measure shall be monitored for success for five years following implementation. A report of the monitoring results shall be submitted annually, during the five years following implementation, to resource agencies as required by the Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement.

136 In the 1st paragraph under BIOLOGY-4, the following additions have been made:

The Proposed Project area is predominantly open for wildlife movement and habitat connectivity. ***Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area.*** Sediment removal and reservoir management activities would interfere temporarily with the movement of native resident or migratory wildlife species, resulting in a significant impact. Reduction in sensitive habitat would interfere with use of the habitat for wildlife nursery sites, resulting in a significant impact. ***To minimize impacts to less than significant, Mitigation Measures MM BIO-1 through MM BIO-8 has been provided.***

Section 3.7 Cultural Resources

Page Clarification/Revision

143 In the 5th paragraph under City of Pasadena Comprehensive General Plan, the following revisions have been made:

Preservation of cultural resources and the City's historic character is a consistent theme throughout the Land Use ~~and Mobility~~ Element of the City of Pasadena Comprehensive General Plan. The values of the community are laid out in the General Plan's Seven Guiding Principles. Principle No. 2 emphasizes the community's fundamental commitment to preservation of its historic character:

The following policies of the Land Use ~~and Mobility~~ Element are related to the preservation of cultural resources:

Section 3.9 Greenhouse Gas Emissions

Page Clarification/Revision

158 In the 2nd paragraph under Sediment Removal/Reservoir Management, the following revisions have been made:

For reservoir management, removal of the sediment, vegetation, trees, and organic debris is expected to require an estimated **200 to a** maximum of ~~300200~~ truck trips per day and off-road equipment including four front loaders with 2-cubic-yard buckets, one bulldozer, an excavator, a grader, water truck, and sorters/crushers.

160 In the 1st paragraph under Table 3.9-3, the following additions have been made:

Typical development projects have short-term construction and long-term operational GHG emissions, where the operational activities generate the majority of the GHG emissions. In order to assess the overall lifetime project GHG emissions, the SCAQMD developed an Interim Guidance that recommends that construction emissions should be amortized over the life of the project, defined in the Guidance as 30 years, which is then added to the reservoir management emissions, and compared to the applicable interim GHG significance threshold tier. Using the above annual emission rates, the sediment removal phase is expected to produce 5,733 tCO₂e per year for 5 years, for a 5-year total of 28,664 tCO₂e. Amortized over 30 years the sediment removal would produce 951 tCO₂e per year. Adding that amount to the 713 tCO₂e per year expected during reservoir management would yield a Proposed Project total annual emissions of 1,669 tCO₂e, which is less than the Tier 3 threshold of 3,000 tCO₂e; therefore the Proposed Project is not “cumulatively considerable” and is therefore less than significant under CEQA. ***Use of sediment removal dump trucks that meet EPA’s emission standards for Model Year 2007 or later and use of off-road equipment that meets, at a minimum, EPA’s emission standards for Tier 3 equipment, would result in a reduction of GHG emissions.***

Section 3.10 Hazards & Hazardous Materials

165 In the 2nd paragraph under Table 3.10-1, the following revision, has been made:

Site assessments that included soil and groundwater sampling in the 1990s, identified the presence of volatile organic compounds (VOCs), including carbon tetrachloride, trichloroethene (TCE), tetrachloroethene (PCE), total chromium, hexavalent chromium, and **perchlorates** ~~rocket fuel~~, detected above regulatory limits.

Section 3.11 Hydrology & Water Quality

179 Table 3.11-3 has been revised:

Table 3.11-3: Potential Sources of Pollution

Activity/Source	Pollutants of Concern
Chemical spills	Engine fuel, diesel, vehicle fluids, hydrocarbons, oil, and grease
Erosion	Sediment, organic matter
Stormwater/nuisance runoff	Particulate matter, associated pollutants, sediment, green waste, organic matter, fuel, oil
Litter and debris	Litter and debris
Loading/unloading areas	Oil and grease, hydrocarbons, litter, heavy metals
Construction activities and storage	Fuel, lubricants, and solvents
Adjacent properties with known hazardous releases	PCBs, VOCs, petroleum hydrocarbons, rocket fuel (perchlorate), SVOCs, heavy metals, organochlorine pesticide
Parking lot runoff	Oil and grease, hydrocarbons, litter, heavy metals
Pet feces	Coliform bacteria
Utility line maintenance and repairs	Chloramines, chlorine, sediment, adhesive cements, primers

181 In the 1st paragraph under United States Army Corps of Engineers (USACE), the following revision, has been made:

USACE is a federal agency responsible for planning civil engineering projects associated with dams, canals, and flood protection in the United States and is responsible for overseeing issues affecting waters of the United States. ~~Under Section 404 of the CWA, an Individual Permit is required for the proposed sediment removal and placement activities. Additionally,~~ as the proposed sediment removal project is considered to be part of the routine maintenance reservoir, a Nationwide Permit (NWP) 31 for Maintenance of Existing Flood Control Facilities **will be required Under Section 404 of the CWA** ~~may also be required~~. The need for this permit and other NWPs (e.g., NWP 3 – Maintenance) can be determined during a pre-application meeting between LACFCD and the USACE Los Angeles District office regulatory branch. The federal mandate associated with the 401 certification of the CWA is addressed and enforced by RWQCB.

Section 3.12 Land Use & Planning

Page Clarification/Revision

188 In the 2nd paragraph under 3.12.2 Existing Environmental Setting, the following detail has been added:

The current leaseholders within Hahamongna Watershed Park include the Los Angeles County Fire Department (Fire Camp 2) and the Rose Bowl Riders, who also sublet to the Tom Sawyer Camp **and MACH 1**.

Section 3.13 Mineral Resources

194 In the 3rd paragraph under MINERALS-1, the following clarification has been made:

Sediment deposited after the sediment removal phase will be removed on an annual basis. The amount of sediment is expected to be small, **typically** 13,000 cy per year. The sediment excavated during reservoir management activities is not expected to involve usable aggregate material or arroyo stone due to unfavorable characteristics such as fine gradation soil and high organic content levels. Impacts involving the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, or a locally important mineral resource recovery site, will be less than significant.

Section 3.15 Recreation & Public Services

Page Clarification/Revision

218 After the 16th paragraph under 3.15.2 Existing Environmental Setting, the following paragraph has been added:

MACH 1

MACH 1 (Move a Child Higher) is a professional therapeutic horsemanship wellness program for people with disabilities. This program also includes MACH 2 (Military and Companion Horses), which offers therapeutic horsemanship activities for military veterans and active duty military personnel. This program is a Professional Association of Therapeutic Horsemanship (PATH) International Premier Accredited Center and has been operated in cooperation with the City of Pasadena for 17 years. MACH 1 is based at the Pasadena Equestrian Center in the Hahamongna Watershed Park. MACH 1 is currently a subtenant of the Rose Bowl Riders. With the support of the City of Pasadena, MACH 1 is developing a new therapeutic riding facility, also located in the Hahamongna Watershed Park's Pasadena Equestrian Center. This facility is expected to be in operation in 2014.

228 In the 4th paragraph under 3.15.6 Impacts and Mitigation, the following detail has been added:

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, **MACH 1**, or Tom Sawyer Camp.

Section 3.16 Transportation & Traffic

Page Clarification/Revision

250 In the 1st paragraph under Sediment Removal, the following clarifications have been made:

The Proposed Project would adhere to traffic regulations regarding truck traffic; however, during sediment removal, Proposed Project truck traffic is expected to impact traffic LOS on the existing roadway network. Potential impacts regarding existing LOS are discussed under TRANSPORTATION-2 below. This increase in traffic would result in **temporary** significant impacts to the efficiency of the circulation system. Implementation of Mitigation Measures MM TRA-1 and TRA-2 would reduce this impact but not to a level of less than significant.

Other potential impact reduction measures discussed under TRANSPORTATION-2, below, could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this **temporary** impact could remain potentially significant.

251 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce impacts to traffic and circulation but not to a level of less than significant. Other potential impact reduction measures discussed under TRANSPORTATION-2, below, could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this **temporary** impact could remain potentially significant. ***No significant traffic impacts would occur under reservoir management.***

251 In the 2nd paragraph under TRANSPORTATION-2, the following clarifications have been made:

Table 3.16-3: LOS for Devil's Gate Reservoir to/from I-210 (eastern disposal sites), Year 2014 with Project Traffic AM Peak Period LOS for Devil's Gate Reservoir to/from I-210 (eastern disposal sites), Year 2014 with Project Traffic AM Peak Period shows the LOS for Proposed Project traffic at year 2014 for the intersections between the reservoir and I-210. All the intersections are anticipated to continue to operate at an LOS D or better

for all utilized intersections during the MID-DAY and PM peak periods. Therefore, no significant impacts will occur at these intersections during the MID-DAY and PM peak periods. The Berkshire Place and I-210 eastbound ramps intersection is anticipated to operate at an unacceptable LOS during the AM peak hour, resulting in a **temporary** significant impact. Table 3.16-4 shows the contribution of Proposed Project traffic to existing conditions and year 2014 conditions for the AM peak period.

252 In the 5th paragraph under TRANSPORTATION-2, the following clarifications have been made:

The impact reduction measure discussed above cannot be legally imposed by the LACFCD since the location is under the jurisdiction of the City of Pasadena. Every reasonable effort will be made to coordinate with and receive approval to implement this impact reduction measure; however, LACFCD cannot guarantee that this impact reduction measure will be implemented. Therefore this **temporary** impact would remain potentially significant.

258 In the 1st paragraph under Vulcan Material Reliance Facility to/from I-210, the following clarifications have been made:

Table 3.16-12 shows the LOS for Proposed Project traffic at year 2014 for the intersections between Vulcan Material Reliance Facility and I-210. All the intersections are anticipated to continue to operate at an LOS D or better for all utilized intersections during the AM and MID-Day peak periods. Therefore, no significant impacts will occur at these intersections during these time periods. The Irwindale Avenue/Foothill Boulevard intersection is anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in a **temporary** significant impact. Table 3.16-13 shows the contribution of Proposed Project traffic to existing conditions and year 2014 conditions for the PM peak period. Implementation of Mitigation Measure MM TRA-1 would reduce the impact to the Irwindale Avenue/Foothill Boulevard intersection to less than significant.

259 In the 2nd paragraph under Scholl Canyon Landfill to/from SR-134, the following clarifications have been made:

The Figueroa St/Scholl Canyon Road and SR-134 westbound ramps intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact.

259 In the 5th paragraph under Scholl Canyon Landfill to/from SR-134, the following clarifications have been made:

This impact reduction measure cannot be legally imposed by the LACFCD. Every reasonable effort will be made to coordinate with and receive approval to implement the impact reduction measure; however, LACFCD cannot guarantee that the measure will be implemented therefore this **temporary** impact could remain significant.

261 In the 2nd paragraph under Sheldon Pit to/from I-210, the following clarifications have been made:

Table 3.16-18 and Table 3.16-19 show the contribution of Proposed Project traffic to existing conditions and Year 2014 conditions for the AM and PM peak periods, respectively. The Glenoaks Boulevard and Osborne Street intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact.

265 In the 1st paragraph under Bradley Landfill to/from I-210, the following clarifications have been made:

Table 3.16-23 and Table 3.16-24 show the contribution of Proposed Project traffic to existing conditions and Year 2014 conditions for the AM and PM Peak Periods, respectively. The Glenoaks Boulevard and Osborne Street intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact.

268 In the 2nd paragraph under Sun Valley Fill Site to/from I-210, the following clarifications have been made:

Table 3.16-21 and Table 3.16-23 show the contribution of Proposed Project traffic to existing conditions and Year 2014 conditions for the AM and PM peak periods, respectively. The Glenoaks Boulevard and Osborne Street intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact.

270 In the 2nd paragraph under Boulevard Pit to/from I-210, the following clarifications have been made:

The Sheldon Street and San Fernando Road intersection and the Branford Street and San Fernando Road intersection are anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in **temporary** significant impacts.

273 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these **temporary** impacts could remain

potentially significant. **No significant traffic impacts would occur under reservoir management.**

273 In the 1st paragraph under TRANSPORTATION-3, the following clarifications have been made:

Implementation of the Proposed Project may include impact reduction measures described above that would require modifications to the existing roadway network. These modifications would consist of roadway restriping to reduce potential traffic impacts to a level less than significant. These changes would not alter existing roadway ~~design~~ **use** and would be implemented consistently with all applicable traffic safety standards. The Proposed Project is limited to excavation and transportation of sediment that has accumulated in Devil's Gate Reservoir and would not introduce any new uses that would be incompatible **or substantially increase hazards** with the existing roadway system. Therefore, impacts related to traffic hazards would be less than significant.

274 In the 1st paragraph under Sediment Removal, the following clarifications have been made:

The Proposed Project would be confined to the roadway network described in Section 3.16.2 and would not adversely affect alternative modes of public transportation such as light rail. Implementation of the Proposed Project would not require closure of any bus stops or disrupt any existing bus routes. The degrading of LOS at intersections, freeway segments, and freeway on- and off-ramps described above under TRANSPORTATION-2 could affect buses using the existing roadway network. This would be a **temporary** significant impact.

274 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these **temporary** impacts could remain potentially significant. **No significant traffic impacts would occur under reservoir management.**

275 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these ***temporary*** impacts could remain potentially significant. ***No significant traffic impacts would occur under reservoir management***

275 In the 3rd paragraph under TRANSPORTATION-6, the following clarification has been made:

As described above under TRANSPORTATION-2, during sediment removal the Proposed Project will result in significant delays at five intersections, resulting in significant cumulative impacts. Implementation of Mitigation Measures MM TRA-1 and MM TRA-2 would reduce the Proposed Project's contribution to these ***temporary*** impacts but would not reduce the Proposed Project's contribution to a level that is to less than significant.

275 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these ***temporary*** impacts could remain potentially significant. ***No significant traffic impacts would occur under reservoir management.***

Section 3.17 Utilities and Service Systems

280 In the 5th paragraph under UTILITIES-1, the following clarification has been made:

During reservoir management, the Proposed Project would not result in or require the construction of new or expansion of existing stormwater drainage systems. Sediment that accumulates after the proposed removal will be removed through FAST operations or through mechanical excavation and trucking. The FAST operations are expected to be similar to historic FAST operations, and fine sediment discharged through FAST operations will be transported during storm flows to the Pacific Ocean via Arroyo Seco and the Los Angeles River. No impacts to stormwater facilities are expected during FAST operations. Any necessary mechanical removal during reservoir management is expected to be small (**typically** 13,000 cubic yards per year). Impacts to stormwater facilities during mechanical removal will be avoided through compliance with City regulations regarding stormwater facilities and implementation of LACDPW BMPs.

Section 4.3 Alternatives to the Proposed Project

Page Clarification/Revision

284 In Table 4.3-1, the following clarifications have been made:

Conflict with or obstruct implementation of the applicable air quality plan?	Potentially Less than Significant with Mitigation	Reduced (remains Potentially Less than Significant with Mitigation)	Increased (remains Potentially Less than Significant with Mitigation)	Reduced (remains Potentially Less than Significant with Mitigation)	Potentially Increased (remains Potentially Less than Significant with Mitigation)	Similar (remains Potentially Less than Significant with Mitigation)	Reduced (Less than Significant)
Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Potentially Less than Significant with Mitigation	Reduced (remains Potentially Less than Significant with Mitigation)	Increased (remains Potentially Less than Significant with Mitigation)	Reduced (remains Potentially Less than Significant with Mitigation)	Potentially Increased (remains Potentially Less than Significant with Mitigation)	Similar (remains Potentially Less than Significant with Mitigation)	Reduced (Less than Significant)
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emission, which exceed quantitative thresholds for ozone precursors)?	Potentially Less than Significant with Mitigation	Reduced (remains Potentially Less than Significant with Mitigation)	Increased (remains Potentially Less than Significant with Mitigation)	Reduced (remains Potentially Less than Significant with Mitigation)	Potentially Increased (remains Potentially Less than Significant with Mitigation)	Similar (remains Potentially Less than Significant with Mitigation)	Reduced (Less than Significant)

Section 4.4 Alternative 1, Configuration B

Page Clarification/Revision

298 In the 2nd paragraph under Sediment Excavation/Trucking Offsite, the following clarifications have been made:

As with the Proposed Project, it is estimated, based on past storm events, that sediment excavation/trucking offsite will be required to remove ~~typically an average of~~ 13,000 cy of sediment annually. Based on an estimated removal of 4,800cy per day, it is expected this will occur over an estimated two-week period, working Monday through Friday. This sediment excavation activity will take place during the late summer/early fall following the vegetation maintenance.

304 In the 2nd paragraph under AIR QUALITY-1, the following clarifications have been made:

As with the Proposed Project (see Section 3.5.6), Alternative 1, Configuration B will be consistent with the second through fourth criteria but will not be consistent with the first criterion. This is due to emissions of NO_x exceeding the Daily Regional Threshold during sediment removal, resulting in a potentially significant impact. Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of Alternative 1, Configuration B's combined NO_x emissions during sediment removal; ~~however, while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, impacts during sediment removal will be less than significant.~~ Therefore, Alternative 1, Configuration B could result in a potentially significant impact. This impact will be reduced in comparison to the Proposed Project due to the reduction in excavation area and associated sediment removal activities.

304 In the 4th paragraph under AIR QUALITY-1, the following clarifications have been made:

MM AQ-1: LACFCD shall require all construction contractors during the sediment removal phase of the Proposed Project to use **only** sediment removal dump trucks that meet the EPA's emission standards for Model Year 2007 ~~or later as reasonably feasible.~~

304 In the 6th paragraph under AIR QUALITY-1, the following clarifications have been made:

Implementation of these mitigations would reduce the Alternative 1, Configuration B's combined NO_x emissions during the sediment removal phase; ~~however, while every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, this impact remains potentially significant and unavoidable.~~

305 In the 1st paragraph under AIR QUALITY-2, the following clarifications have been made:

As with the Proposed Project, under Alternative 1, Configuration B emissions of NO_x exceed the Daily Regional Threshold during sediment removal, resulting in a potentially

significant impact. Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of Alternative 1, Configuration B's combined NO_x emissions during sediment removal; ~~however, while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions~~ to a level of less than significant. ~~Therefore, this impact remains potentially significant and unavoidable.~~ This impact will be reduced in comparison to the Proposed Project due to the reduction in excavation area and associated sediment removal activities.

306 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Implementation of these mitigations would reduce Alternative 1, Configuration B's combined NO_x emissions during the sediment removal phase; ~~however, while every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions~~ to a level of less than significant. ~~Therefore, this impact remains potentially significant and unavoidable.~~

307 In the 1st paragraph under Cumulative Health Effects, the following clarifications have been made:

As with the Proposed Project, for Alternative 1, Configuration B, during sediment removal, significance threshold would not be exceeded for emissions of particulate matter and CO; no significance threshold would be exceeded during reservoir management under either option. ~~Nevertheless, while every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~ **Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of NO_x emissions and will reduce the NO_x emissions to a level of less than significant for the sediment removal phase.**

307 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Sediment removal will not exceed any localized significance threshold except for combined NO_x emissions. Implementation of these mitigations would reduce Alternative 1, Configuration B's combined NO_x emissions during the sediment removal phase; ~~however, while all effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions~~ to a level of less than significant. ~~Therefore, this impact remains potentially significant and unavoidable.~~

310 In Table 4.4-1, the following revision has been made:

Vegetation Communities	Estimated Acres of Vegetation Removed During Sediment Removal	
	Proposed Project	Alternative 1 Configuration B
Riversidean Alluvial Fan Sage Scrub	1.1	0.1
Coastal Sage Scrub California Sagebrush – California Buckwheat Scrub	3.1	1.9
Scoured	26.5	13.0
Ornamental Landscaping Escaped Cultivars	0.4	0.2
Riparian Woodland	51.4	37.2
Mustard and Annual Brome Semi-Natural Herbaceous Stand	22.8	17.4
Ruderal		
Mule Fat Scrub Thickets	11.1 9.3	10.4 6
Disturbed	1.9	0.9
Riparian Herbaceous	1.8	1.8

310 In the 3rd paragraph under Sensitive Wildlife, the following clarification has been made:

As shown in Communities and Table 4.4-1, potential impacts to sensitive wildlife will be reduced in comparison to the Proposed Project due to the reduction in habitat disturbed during sediment removal activities. Disturbance of habitat for the least Bell's vireo within Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~ communities will be reduced by approximately 14.2 acres (28 percent) and 0.7 acre (7 percent), respectively, as compared to the Proposed Project.

311 Figure 4.4-2 was revised to reflect changes to the naming of vegetation communities.

312 In the 4th paragraph under Sensitive Wildlife, the following clarification has been made:

Disturbance of habitat for the yellow warbler within the Riparian Woodland community will be reduced by approximately 14.2 acres (28 percent), as compared to the Proposed Project. ~~Impacts to Riparian Herbaceous will be the same as for the Proposed Project.~~

312 In the 1st and 2nd paragraphs under Reservoir Management, the following revision has been made:

Figure 4.4-3: Alternative 1, Configuration B Expected Vegetation Communities Under Reservoir Management shows expected conditions of the vegetation communities under reservoir management for Alternative 1, Configuration B in comparison to the Proposed Project. As shown below, Alternative 1, Configuration B will result in a greater diversity of vegetation communities, including a greater amount of Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~. Under Alternative 1, Configuration B, a greater area of the Proposed Project site will be left undisturbed during reservoir management, approximately 37.34 acres. In contrast, under the Proposed Project's reservoir management Option 1, the whole Proposed Project

site, approximately 120.42 acres, will be disturbed annually. Under the Proposed Project's reservoir management Option 2, 33.97 acres will be left undisturbed during reservoir management.

The reservoir management area for Alternative 1, Configuration B is expected to be composed of ~~Riparian-Herbaceous~~ **Mule Fat Thickets** and **Mustard and Annual Brome Semi-Natural Herbaceous Stand** ~~ruderal~~ communities. The availability of streams and seasonal ponds will depend upon where sediment accumulates and the amount of flows, rainfall, and runoff.

313 Figure 4.4-3 was revised to reflect changes to the naming of vegetation communities.

314 In the 1st paragraph under Mitigation Measures, the following details have been added:

MM BIO – 1: A qualified biological monitor shall be present during initial ground- or vegetation-disturbing project-related activities ***to provide protection measures and monitor for wildlife in harm's way. This includes initial ground- or vegetation-disturbing project-related activities at the annual start of each year of sediment removal or maintenance activities.*** Following initial project-related activities, a qualified monitoring biologist shall be present as necessary to maintain the implemented protection measures and monitor for additional species in harm's way. ***These protection measures shall include, as appropriate: redirecting the wildlife, identifying areas that may require exclusionary devices (e.g., fencing), or capturing and relocating wildlife outside the work area. Any captured species shall be relocated to adjacent appropriate habitat that is contiguous to adjacent habitat and not impacted by project-related disturbance activities.***

314 In the 3rd paragraph under Mitigation Measures, the following detail has been added:

MM BIO – 3: Within 90 days prior to ground-disturbing activities, a preconstruction survey shall be conducted by a qualified biologist for the presence of any sensitive species in harm's way, including coast range newt, the southwestern pond turtle, and the two-striped garter snake. If sensitive species are observed in harm's way, the qualified biologist will develop and implement appropriate protection measures for that species. These protection measures shall include, as appropriate, redirecting the species, ~~constructing construction of~~ exclusionary devices (e.g., fencing), or ~~capturing capture and relocating relocation~~ ***wildlife*** outside the work area. Preconstruction surveys shall be repeated annually for the duration of the sediment removal. ***Observations of special status species made during these surveys shall be recorded onto a CNDDDB field data sheet and submitted to CDFW for inclusion into the CNDDB.***

315 In the 7th paragraph under Mitigation Measures, the following details have been added:

MM BIO – 5: Within 30 days prior to commencement of vegetation or structure removal activities, a preconstruction bat survey shall be conducted by a qualified biologist for the presence of any roosting bats. **Acoustic recognition technology shall be used if feasible and appropriate.** If either a bat maternity roost or hibernacula (structures used by bats for hibernation) are present, a qualified biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. These protection measures shall include, as appropriate, safely evicting non-breeding bat hibernacula, establishment of avoidance buffers, or replacement of roosts at a suitable location. **These measures shall also include as appropriate:**

- **To the extent feasible, trees that have been identified as roosting sites shall be removed or relocated between October 1 and February 28.**
- **When trees must be removed during the maternity season (March 1 to September 30), a qualified bat specialist shall conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.**
- **Trees identified as potentially supporting an active nursery roost shall be inspected by a qualified biologist no greater than 7 days prior to tree disturbance to determine presence or absence of roosting bats.**
- **Trees determined to support active maternity roosts will be left in place until the end of the maternity season (September 30).**
- **If bats are not detected in a tree, but the qualified biologist determines that roosting bats may still be present, trees shall be removed as follows:**
 - **Pushing a tree down with heavy machinery instead of felling the tree with a chainsaw**
 - **First pushing the tree lightly 2 to 3 times with a pause of 30 seconds between each nudge to allow bats to become active, then pushing the tree to the ground slowly**
 - **Allowing the tree to remain in place for 24 to 48 hours until inspected by the qualified biologist for presence or absence of roosting bats**
- **The qualified biologist shall document all bat survey, monitoring, and protection measure activities and prepare a summary report for LACFCD.**

316 In the 2nd paragraph under BIOLOGY-2, the following clarifications have been made:

This alternative will impact approximately 37.2 acres of Riparian Woodland and ~~8.6~~ **10.4** acres of **Mule Fat Thickets** ~~Mule Fat Scrub~~ within the Proposed Project site. Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~ are rare plant communities that provide nesting habitat for

riparian species. Impacts to these habitats will result in a significant impact; however, disturbance of Riparian Woodland and **Mule Fat Thickets Mule Fat Scrub** will be reduced by approximately 14.2 acres (28 percent) and 0.7 acre (7 percent), respectively, as compared to the Proposed Project. To minimize impacts due to the loss of Riparian Woodland and **Mule Fat Thickets Mule Fat Scrub**, Mitigation Measures MM BIO-7 and MM BIO-8 have been provided. With implementation of these mitigation measures, impacts to Riparian Woodland and **Mule Fat Thickets Mule Fat Scrub** will be reduced to a level below significance.

317 In MM BIO – 8, the following clarifications have been made:

MM BIO – 8: A combination of onsite and offsite habitat restoration, enhancement, and exotic removal shall be implemented by LACFCD at a 1:1 ratio for impacted sensitive habitat and jurisdictional waters. Habitat restoration/enhancement shall include use of willow cuttings and exotic species removal. **Non-native, weedy Ruderat** habitats within the basin shall be utilized whenever possible as mitigation sites. This mitigation measure shall be monitored for success for five years following implementation. A report of the monitoring results shall be submitted annually, during the five years following implementation, to resource agencies as required by the Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement.

320 In the 1st paragraph under BIOLOGY-4, the following information has been added:

The Proposed Project area is predominantly open for wildlife movement and habitat connectivity. **Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area.** Sediment removal and reservoir management activities associated with Alternative 1, Configuration B will interfere temporarily with the movement of native resident or migratory wildlife species, resulting in a significant impact. Reduction in sensitive habitat would interfere with use of the habitat for wildlife nursery sites, resulting in a significant impact. **To minimize impacts to less than significant, Mitigation Measures MM BIO-1 through MM BIO-8 has been provided.** This impact will be reduced in comparison to the Proposed Project due to the reduction in area disturbed during sediment removal and either reservoir management option.

325 In the 1st paragraph under GHG EMISSIONS-1, the following information has been added:

Alternative 1, Configuration B will use the same amount and type of construction equipment as the Proposed Project and involve the same number of truck trips on a daily basis for sediment removal and reservoir management; however, sediment removal under this Alternative is expected to have a shorter duration than the Proposed Project due to the reduced amount of sediment to be removed. **Use of sediment removal dump trucks that meet EPA's emission standards for Model Year 2007 or later and use of off-road equipment that meets, at a minimum, EPA's emission standards**

for Tier 3 equipment, would result in a reduction of GHG emissions. As noted in Section 3.6, generation of greenhouse gas emissions under the Proposed Project is not “cumulatively considerable” and is therefore less than significant under CEQA. Alternative 1, Configuration B will have the same amount of daily equipment usage/truck traffic and reduced overall sediment removal duration; therefore, this alternative will generate less greenhouse gas emissions than the Proposed Project. This impact will not be “cumulatively considerable” and is therefore less than significant under CEQA.

341 In the 4th paragraph under Recreation and Public Services, the following detail has been added:

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, **MACH 1**, or Tom Sawyer Camp.

345 In the 1st and 2nd paragraphs under TRANSPORTATION-1, the following clarifications have been made:

Truck traffic associated with Alternative 1, Configuration B is expected to adhere to traffic regulations; however, during sediment removal, Alternative 1, Configuration B truck traffic is expected to impact traffic LOS on the existing roadway network. Potential impacts regarding existing LOS are discussed under TRANSPORTATION-2 below. This increase in traffic would result in **temporary** significant impacts to the efficiency of the circulation system. Implementation of Mitigation Measures MM TRA-1 and TRA-2 would reduce this **temporary** impact but not to a level of less than significant.

Sediment removal and associated transportation under this Alternative could potentially have a shorter duration than the Proposed Project due to the reduced amount of sediment to be removed. Other potential impact reduction measures discussed under TRANSPORTATION-2, below, could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this **temporary** impact could remain potentially significant.

346 In the 1st paragraph under Residual Impacts after Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce **temporary** impacts to traffic and circulation but not to a level of less than significant. Other potential impact reduction measures discussed under TRANSPORTATION-2, below, could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other

agencies. Every reasonable effort will 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 will be implemented. Therefore, this **temporary** impact could remain potentially significant. **No significant traffic impacts would occur under reservoir management.**

347 In the 4th paragraph under TRANSPORTATION-2, the following clarifications have been made:

The impact reduction measure discussed above cannot be legally imposed by the LACFCD since the location is under the jurisdiction of the City of Pasadena. Every reasonable effort will be made to coordinate with and receive approval to implement this impact reduction measure; however, LACFCD cannot guarantee that this impact reduction measure will be implemented. Therefore this **temporary** impact would remain potentially significant.

348 In the 5th and 6th paragraphs under TRANSPORTATION-2, the following clarifications have been made:

The Irwindale Avenue/Foothill Boulevard intersection is anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in a **temporary** significant impact. Mitigation Measure MM TRA-1 would reduce the impact to the Irwindale Avenue/Foothill Boulevard intersection to less than significant.

The Figueroa St/Scholl Canyon Road and SR-134 westbound ramps intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact.

348 In the 7th, 8th, and 9th paragraphs under TRANSPORTATION-2, the following clarifications have been made:

Implementation of the impact reduction measure discussed above would reduce the impact to the Figueroa St/Scholl Canyon Road and SR-134 westbound ramps intersection to less than significant. This impact reduction measure cannot be legally imposed by the LACFCD. Every reasonable effort will be made to coordinate with and receive approval to implement the impact reduction measure; however, LACFCD cannot guarantee that the measure will be implemented therefore this **temporary** impact could remain significant.

The Glenoaks Boulevard and Osborne Street intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact.

The Sheldon Street and San Fernando Road intersection and the Branford Street and San Fernando Road intersection are anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in **temporary** significant impacts. Mitigation Measure MM TRA-2 would reduce the impacts to less than significant.

349 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these **temporary** impacts could remain potentially significant. ***No significant traffic impacts would occur under reservoir management.***

349 In the 1st paragraph under TRANSPORTATION-3, the following clarifications have been made:

Implementation of the Alternative 1, Configuration B may include impact reduction measures described above that would require modifications to the existing roadway network. These modifications would consist of roadway restriping to reduce potential traffic impacts to a level less than significant. These changes would not alter existing roadway ~~design~~ **use** and would be implemented consistently with all applicable traffic safety standards. Alternative 1, Configuration B is limited to excavation and transportation of sediment that has accumulated in Devil's Gate Reservoir and would not introduce any new uses that would be incompatible **or substantially increase hazards** with the existing roadway system. Therefore, impacts related to traffic hazards would be less than significant.

351 In the 1st paragraph under TRANSPORTATION-5, the following clarifications have been made:

Alternative 1, Configuration B would be confined to the roadway network described in Section 3.16.2 and would not adversely affect alternative modes of public transportation such as light rail. Implementation of Alternative 1, Configuration B would not require closure of any bus stops or disrupt any existing bus routes. The degrading of LOS at intersections, freeway segments, and freeway on- and off-ramps described above under TRANSPORTATION-2 could affect buses using the existing roadway network. This would be a **temporary** potentially significant impact.

351 In the 4th paragraph under TRANSPORTATION-5, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal

phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these **temporary** impacts could remain potentially significant. **No significant traffic impacts would occur under reservoir management.**

352 In the 3rd paragraph under UTILITIES-1, the following clarification has been made:

During reservoir management, Alternative 1, Configuration B will not result in or require the construction of new or expansion of existing stormwater drainage systems. Sediment that accumulates after the proposed removal will be removed through FAST operations or through mechanical excavation and trucking. The FAST operations are expected to be similar to historic FAST operations, and sediment fines discharged through FAST operations will be transported during storm flows to the Pacific Ocean via Arroyo Seco and the Los Angeles River. No impacts to stormwater facilities are expected during FAST operations. Any necessary mechanical removal during reservoir management is expected to be small (**typically** 13,000 cy per year). Impacts to stormwater facilities during mechanical removal will be avoided through compliance with City regulations regarding stormwater facilities and implementation of LACDPW BMPs.

Section 4.5 Alternative 2, Configuration C

Page Clarification/Revision

357 In the 4th paragraph under Sediment Excavation/Trucking Offsite, the following clarifications have been made:

As with the Proposed Project, it is estimated, based on past storm events, that sediment excavation/trucking offsite will be required to remove **typically an average of** 13,000 cy of sediment annually. Based on an estimated removal of 4,800 cy per day, it is expected this will occur over an estimated two-week period, working Monday through Friday. This sediment excavation activity will take place during the late summer/early fall following the vegetation maintenance.

363 In the 2nd paragraph under AIR QUALITY-1, the following clarifications have been made:

As with the Proposed Project (see Section 3.5.6), Alternative 2, Configuration C will be consistent with the second through fourth criteria, but will not be consistent with the first criterion. This is due to emissions of NO_x exceeding the Daily Regional Threshold during sediment removal, resulting in a potentially significant impact. Use of sediment

removal dump trucks that meet EPA's emission standards for Model Year 2007, and use of off-road equipment that meets, at a minimum, EPA's emission standards for ~~Tier 3 Tier 4~~ interim equipment, would result in a reduction of NO_x emissions to less than the SCAQMD Regional Threshold for NO_x. ~~Every effort will be made to strive for the newest vehicles/equipment reasonably available.~~ Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of NO_x emissions to less than the SCAQMD Regional Threshold for NO_x. ~~; however, the actual vehicles/equipment used may not reach the levels required to reduce the NO_x emissions to a level of less than significant for the sediment removal phase. Therefore, Alternative 2, Configuration C could result in a potentially significant impact.~~ **Therefore, impacts during sediment removal will be less than significant.** This impact will be greater in comparison to the Proposed Project due to the increase in excavation volume and associated sediment removal activities.

363 In the 1st paragraph under Mitigation Measures, the following clarification has been made:

MM AQ-1: LACFCD shall require all construction contractors during the sediment removal phase of the Proposed Project to use **only** sediment removal dump trucks that meet EPA's emission standards for Model Year 2007 **or later** ~~as reasonably feasible~~.

364 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Implementation of these mitigations would reduce Alternative 2, Configuration C's combined NO_x emissions during the sediment removal phase. ~~However, while all effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, this impact remains potentially significant and unavoidable.~~

364 In the 1st paragraph under AIR QUALITY-2, the following clarifications have been made:

Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of Alternative 2, Configuration C's combined NO_x emissions during sediment removal. ~~However, while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~ This impact will be increased in comparison to the Proposed Project due to the increase in excavation volume and associated sediment removal activities.

365 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Sediment removal will not exceed any standard SCAQMD Regional Threshold except for combined NO_x emissions. Implementation of these mitigations would reduce Alternative 2, Configuration C's combined NO_x emissions during the sediment removal phase. ~~While every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x~~

emissions to a level of less than significant. Therefore, this impact remains potentially significant and unavoidable.

366 In the 1st paragraph under Cumulative Health Impacts, the following clarifications have been made:

As with the Proposed Project, for Alternative 2, Configuration C with Mitigation Measures MM AQ-1 and MM AQ-2, a significance threshold would not be exceeded for emissions of particulate matter and CO; and no significance threshold would be exceeded during reservoir management under either option. ~~While every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains potentially significant and unavoidable.~~ **Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of NO_x emissions and will reduce the NO_x emissions to a level of less than significant for the sediment removal phase.**

366 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Sediment removal will not exceed any localized significance threshold except for combined NO_x emissions. Implementation of these mitigations would reduce Alternative 2, Configuration C's combined NO_x emissions during the sediment removal phase; ~~however, while all effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~

369 In Table 4.5-1, the following clarification has been made:

Vegetation Communities	Estimated Acres of Vegetation Removed During Sediment Removal	
	Proposed Project	Alternative 2 Configuration C
Riversidean Alluvial Fan Sage Scrub	1.1	0.2
Coastal Sage Scrub California Sagebrush – California Buckwheat Scrub	3.1	0.2
Scoured	26.5	20.0
Ornamental Landscaping Escaped Cultivars	0.4	0.3
Riparian Woodland	51.4	34.1
Mustard and Annual Brome Semi-Natural Herbaceous Stand Ruderal	22.8	16.2
Mule Fat Thickets Mule Fat Scrub	11.1 9.3	9.8 8.0
Disturbed	1.9	0.8
Riparian Herbaceous	1.8	1.8

369 In the 3rd paragraph under Sensitive Wildlife, the following clarification has been made:

As shown in Figure 4.5-2: Alternative 2, Configuration C Sediment Removal Vegetation Communities Impacts and Table 4.5-1, potential impacts to sensitive wildlife will be reduced in comparison to the Proposed Project due to the reduction in habitat disturbed during sediment removal activities. Disturbance of habitat for the least Bell's vireo within Riparian Woodland and **Mule Fat Thickets** ~~Mule-Fat Scrub~~ communities will be reduced by approximately 17.3 acres (33 percent) and 1.3 acres (14 percent), respectively, as compared to the Proposed Project.

370 Figure 4.5-2 was revised to reflect changes to the naming of vegetation communities.

371 In the 1st paragraph on the page, the following clarification has been made:

Disturbance of habitat for the yellow warbler within the Riparian Woodland community will be reduced by approximately 17.3 acres (33 percent), as compared to the Proposed Project. ~~Impacts to Riparian Herbaceous will be the same as for the Proposed Project.~~

371 In the 1st and 2nd paragraphs under Reservoir Management, the following revision has been made:

Figure 4.5-3: Alternative 2, Configuration C Expected Vegetation Communities Under Reservoir Management shows expected conditions of the vegetation communities under reservoir management for Alternative 2, Configuration C in comparison to the Proposed Project. As shown below, Alternative 2, Configuration C will result in a greater diversity of vegetation communities, including a greater amount of Riparian Woodland and **Mule Fat Thickets** ~~Mule-Fat Scrub~~. Under Alternative 2, Configuration C, a greater area of the Proposed Project site will be left undisturbed during reservoir management, approximately 36.46 acres. In contrast, under the Proposed Project's reservoir management Option 1, the whole Proposed Project site, approximately 120.42 acres, will be disturbed annually. Under the Proposed Project's reservoir management Option 2, 33.97 acres will be left undisturbed during reservoir management.

The reservoir management area for Alternative 2, Configuration C is expected to be composed of Riparian Herbaceous and **Mustard and Annual Brome Semi-Natural Herbaceous Stand** ~~ruderal~~ communities. Streams and seasonal ponds will be available depending upon where sediment accumulates and the amount of flows, rainfall, and runoff. Special status species have the potential to use the reservoir management area.

372 Figure 4.5-3 was revised to reflect changes to the naming of vegetation communities.

373 In the 1st paragraph under Mitigation Measures, the following details have been added:

MM BIO – 1: A qualified biological monitor shall be present during initial ground- or vegetation-disturbing project-related activities **to provide protection measures and monitor for wildlife in harm's way. This includes initial ground- or vegetation-**

disturbing project-related activities at the annual start of each year of sediment removal or maintenance activities. Following initial project-related activities, a qualified monitoring biologist shall be present as necessary to maintain the implemented protection measures and monitor for additional species in harm's way. **These protection measures shall include, as appropriate: redirecting the wildlife, identifying areas that may require exclusionary devices (e.g., fencing), or capturing and relocating wildlife outside the work area. Any captured species shall be relocated to adjacent appropriate habitat that is contiguous to adjacent habitat and not impacted by project-related disturbance activities.**

373 In the 3rd paragraph under Mitigation Measures, the following detail has been added:

MM BIO – 3: Within 90 days prior to ground-disturbing activities, a preconstruction survey shall be conducted by a qualified biologist for the presence of any sensitive species in harm's way, including coast range newt, the southwestern pond turtle, and the two-striped garter snake. If sensitive species are observed in harm's way, the qualified biologist will develop and implement appropriate protection measures for that species. These protection measures shall include, as appropriate: redirecting the species, ~~constructing construction of~~ exclusionary devices (e.g., fencing), or ~~capturing capture and relocating relocation~~ wildlife outside the work area. Preconstruction surveys shall be repeated annually for the duration of the sediment removal. **Observations of special status species made during these surveys shall be recorded onto a CNDDDB field data sheet and submitted to CDFW for inclusion into the CNDDDB.**

374 In the 7th paragraph under Mitigation Measures, the following details have been added:

MM BIO – 5: Within 30 days prior to commencement of vegetation or structure removal activities, a preconstruction bat survey shall be conducted by a qualified biologist for the presence of any roosting bats. **Acoustic recognition technology shall be used if feasible and appropriate.** If either a bat maternity roost or hibernacula (structures used by bats for hibernation) **are** present, a qualified biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. These protection measures shall include, as appropriate, safely evicting non-breeding bat hibernacula, establishment of avoidance buffers, or replacement of roosts at a suitable location. **These measures shall also include as appropriate:**

- **To the extent feasible, trees that have been identified as roosting sites shall be removed or relocated between October 1 and February 28.**
- **When trees must be removed during the maternity season (March 1 to September 30), a qualified bat specialist shall conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.**
- **Trees identified as potentially supporting an active nursery roost shall be inspected by a qualified biologist no greater than 7 days prior to tree disturbance to determine presence or absence of roosting bats.**

- **Trees determined to support active maternity roosts will be left in place until the end of the maternity season (September 30).**
- **If bats are not detected in a tree, but the qualified biologist determines that roosting bats may still be present, trees shall be removed as follows:**
 - **Pushing a tree down with heavy machinery instead of felling the tree with a chainsaw**
 - **First pushing the tree lightly 2 to 3 times with a pause of 30 seconds between each nudge to allow bats to become active, then pushing the tree to the ground slowly**
 - **Allowing the tree to remain in place for 24 to 48 hours until inspected by the qualified biologist for presence or absence of roosting bats**
- **The qualified biologist shall document all bat survey, monitoring, and protection measure activities and prepare a summary report for LACFCD.**

375

In the 2nd paragraph under BIOLOGY-2, the following clarification has been made:

This alternative will impact approximately 34.1 acres of Riparian Woodland and ~~8.0~~ **9.8** acres of **Mule Fat Thickets** ~~Mule Fat Scrub~~ within the Proposed Project site. Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~ are rare plant communities that provide nesting habitat for riparian species. Impacts to these habitats will result in a potentially significant impact; however, disturbance of Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~ will be reduced by approximately 17.3 acres (33 percent) and 1.3 acre (14 percent), respectively, as compared to the Proposed Project. To minimize impacts due to the loss of Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~, Mitigation Measures MM BIO-7 and MM BIO-8 have been provided. With implementation of these mitigation measures, impacts to Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~ will be reduced to a level below significance.

376

In MM BIO – 8, the following clarifications have been made:

MM BIO – 8: A combination of onsite and offsite habitat restoration, enhancement, and exotic removal shall be implemented by LACFCD at a 1:1 ratio for impacted sensitive habitat and jurisdictional waters. Habitat restoration/enhancement shall include use of willow cuttings and exotic species removal. **Non-native, weedy** ~~Ruderal~~ habitats within the basin shall be utilized whenever possible as mitigation sites. This mitigation measure shall be monitored for success for five years following implementation. A report of the monitoring results shall be submitted annually, during the five years following implementation, to resource agencies as required by the Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement.

379 In the 1st paragraph under BIOLOGY-4, the following information has been added:

The Proposed Project area is predominantly open for wildlife movement and habitat connectivity. **Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area.** Sediment removal and reservoir management activities associated with Alternative 2, Configuration C will interfere temporarily with the movement of native resident or migratory wildlife species, resulting in a potentially significant impact. Reduction in sensitive habitat would interfere with use of the habitat for wildlife nursery sites, resulting in a potentially significant impact. **To minimize impacts to less than significant, Mitigation Measures MM BIO-1 through MM BIO-8 has been provided.** This impact will be reduced in comparison to the Proposed Project due to the reduction in area disturbed during sediment removal and both reservoir management options.

385 In the 1st paragraph under GHG EMISSIONS-1, the following information has been added:

Alternative 2, Configuration C will use the same amount and type of construction equipment as the Proposed Project and involve the same number of truck trips on a daily basis for sediment removal and reservoir management; however, sediment removal under this Alternative is expected to have a longer duration than the Proposed Project due to the increased amount of sediment to be removed. **Use of sediment removal dump trucks that meet EPA's emission standards for Model Year 2007 or later and use of off-road equipment that meets, at a minimum, EPA's emission standards for Tier 3 equipment, would result in a reduction of GHG emissions.** As noted in Section 3.6, generation of greenhouse gas emissions under the Proposed Project is not "cumulatively considerable" and is therefore less than significant under CEQA. Alternative 2, Configuration C will have the same amount of daily equipment usage/truck traffic and increased overall sediment removal duration; therefore, this alternative will generate greater greenhouse gas emissions than the Proposed Project, but will be not "cumulatively considerable," and is therefore less than significant under CEQA.

400 In the 4th paragraph under Recreation and Public Services, the following detail has been added:

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, **MACH 1**, or Tom Sawyer Camp.

404 In the 1st paragraph under TRANSPORTATION-1, the following clarifications have been made:

Truck traffic associated with the Alternative 2, Configuration C is expected to adhere to traffic regulations; however, during sediment removal, Alternative 2, Configuration C truck traffic is expected to impact traffic LOS on the existing roadway network. Potential impacts regarding existing LOS are discussed under TRANSPORTATION-2 below. This increase in traffic would result in **temporary** significant impacts to the efficiency of the circulation system. Implementation of Mitigation Measures MM TRA-1 and TRA-2 would reduce this **temporary** impact but not to a level of less than significant.

405 At the end of the 2nd paragraph under TRANSPORTATION-1, the following clarification has been made:

Therefore, this **temporary** impact could remain potentially significant.

405 In the 1st paragraph under Residual Impacts After Mitigation, the following clarification has been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce impacts to traffic and circulation but not to a level of less than significant. Other potential impact reduction measures discussed under TRANSPORTATION-2, below, could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this **temporary** impact could remain potentially significant. **No significant traffic impacts would occur under reservoir management.**

406 In the 4th paragraph under TRANSPORTATION-2, the following clarification has been made:

The impact reduction measure discussed above cannot be legally imposed by the LACFCD since the location is under the jurisdiction of the City of Pasadena. Every reasonable effort will be made to coordinate with and receive approval to implement this impact reduction measure; however, LACFCD cannot guarantee that this impact reduction measure will be implemented. Therefore this **temporary** impact would remain potentially significant.

407 In the 5th and 6th paragraphs under TRANSPORTATION-2, the following clarifications have been made:

The Irwindale Avenue/Foothill Boulevard intersection is anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in a **temporary** significant impact.

Mitigation Measure MM TRA-1 would reduce the impact to the Irwindale Avenue/Foothill Boulevard intersection to less than significant.

The Figueroa St/Scholl Canyon Road and SR-134 westbound ramps intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact.

407 In the 7th, 8th, and 9th paragraphs under TRANSPORTATION-2, the following clarifications have been made:

Implementation of the impact reduction measure discussed above would reduce the impact to the Figueroa St/Scholl Canyon Road and SR-134 westbound ramps intersection to less than significant. This impact reduction measure cannot be legally imposed by the LACFCD. Every reasonable effort will be made to coordinate with and receive approval to implement the impact reduction measure; however, LACFCD cannot guarantee that the measure will be implemented therefore this **temporary** impact could remain significant.

The Glenoaks Boulevard and Osborne Street intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact.

The Sheldon Street and San Fernando Road intersection and the Branford Street and San Fernando Road intersection are anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in **temporary** significant impacts. Mitigation Measure MM TRA-2 would reduce the impacts to less than significant.

408 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these **temporary** impacts could remain potentially significant. ***No significant traffic impacts would occur under reservoir management.***

408 In the 1st paragraph under TRANSPORTATION-3, the following clarification has been made:

Implementation of Alternative 2, Configuration C may include impact reduction measures described above that would require modifications to the existing roadway network. These modifications would consist of roadway restriping to reduce potential traffic impacts to a level less than significant. These changes would not alter existing roadway ~~design~~ **use** and would be implemented consistently with all applicable traffic safety standards. Alternative 2, Configuration C is limited to excavation and transportation of sediment that has accumulated in Devil's Gate Reservoir and would not introduce any new uses that would be incompatible **or substantially increase hazards** with the existing roadway system. Therefore, impacts related to traffic hazards would be less than significant.

410 In the 1st paragraph of TRANSPORTATION-5, the following clarification has been made:

Alternative 2, Configuration C would be confined to the roadway network described in Section 3.16.2 and would not adversely affect alternative modes of public transportation such as light rail. Implementation of Alternative 2, Configuration C would not require closure of any bus stops or disrupt any existing bus routes. The degrading of LOS at intersections, freeway segments, and freeway on- and off-ramps described above under TRANSPORTATION-2 could affect buses using the existing roadway network. This would be a **temporary** potentially significant impact.

410 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these **temporary** impacts could remain potentially significant. ***No significant traffic impacts would occur under reservoir management.***

411 In the 3rd paragraph under UTILITIES-1, the following clarification has been made:

During reservoir management, Alternative 2, Configuration C will not result in or require the construction of new or expansion of existing stormwater drainage systems. Sediment that accumulates at the front of the reservoir after the proposed removal will be removed through FAST operations or through mechanical excavation, and sediment accumulated at the back basin will be removed through trucking. The FAST operations

are expected to be similar to historic FAST operations, and sediment fines discharged through FAST operations will be transported during storm flows to the Pacific Ocean via Arroyo Seco and the Los Angeles River. No impacts to stormwater facilities are expected during FAST operations. Any necessary mechanical removal during reservoir management is expected to be small (**typically** 13,000 cy per year). Impacts to stormwater facilities during mechanical removal will be avoided through compliance with City regulations regarding stormwater facilities and implementation of LACDPW BMPs.

Section 4.6 Alternative 3, Configuration D

Page Clarification/Revision

413 In the 1st paragraph under 4.6.1 Alternative Description, the following information has been added:

Alternative 3, Configuration D, Option 1

Sediment Removal

Alternative 3, Configuration D, ***Option 1*** excavation activities will remove approximately 2.4 million cy of current excess sediment in the reservoir in addition to any additional sediment received during the project.

Excavation/Reservoir Configuration

Specific excavation limits and reservoir configuration for Alternative 3, Configuration D, ***Option 1*** are shown in

Figure 4.6-1: Alternative 3, Configuration D, ***Option 1*** Sediment Removal and Reservoir Management Areas. As shown in Figure 4.6-1, the basin will be excavated to an elevation of approximately 985 feet at the face of the dam, sloping up to a 995-foot elevation where the basin splits and narrows into two excavation branches. Both branches slope up to a 1,040-foot elevation, at which point the western branch ends and the eastern branch widens and continues to slope up to a 1,060-foot elevation at approximately 4,700 feet north of the dam. The final configuration will involve approximately 76 acres of the reservoir. Additionally, this alternative will include removal of sediment stockpiled as part of the IMP at Johnson Field. Excavation will not involve the Oak Grove area of Hahamongna Park, the area of the reservoir outside the excavation limits shown in Figure 4.6-1, or the City of Pasadena's spreading grounds on the east side of the basin.

Alternative 3, Configuration D, Option 2

Sediment Removal

Alternative 3, Configuration D, Option 2 excavation activities will remove approximately 2.4 million cy of current excess sediment in the reservoir in addition to any additional sediment received during the project.

Excavation/Reservoir Configuration

Specific excavation limits and reservoir configuration for Alternative 3, Configuration D, Option 2 are shown in

Figure 4.6-1: Alternative 3, Configuration D, Option 1 Sediment Removal and Reservoir Management Areas. As shown in Figure 4.6-2, the basin will be excavated to an elevation of approximately 985 feet at the face of the dam, sloping up to a 995-foot elevation where the basin narrows into one excavation branch. The branch, which is in the eastern portion of the reservoir, slopes up to a 1,060-foot elevation at approximately 4,700 feet north of the dam. The final configuration will involve approximately 70 acres of the reservoir. Additionally, this alternative will include removal of sediment stockpiled at Johnson Field as part of the IMP. Excavation will not involve the Oak Grove area of Hahamongna Park, the area of the reservoir outside the excavation limits shown in Figure 4.6-2, or the City of Pasadena's spreading grounds on the east side of the basin.

414 In the 2nd paragraph under Removal Method, the following addition has been made:

The accumulated sediment will be excavated within the limits shown in Figure 4.6-1 **for Alternative 3, Configuration D, Option 1 and shown in Figure 4.6-2 for Alternative 3, Configuration D, Option 2.** The excavation will be accomplished using the same removal method as the Proposed Project. Construction equipment will include but not be limited to approximately four front loaders with 4-yard buckets, two bulldozers, one excavator, one grader, one water truck, and two tender trucks. Vegetation and organic debris will be separated from the sediment. Coarse material may need to be processed through sorters and crushers to be hauled offsite. Depending on the moisture content of the sediment removed, the sediment may need to be stockpiled to allow it to dry. If drying is required, stockpiling of the sediment will occur onsite within the excavation limits in Devil's Gate Reservoir.

415 In the 2nd paragraph under Reservoir Management, the following additions have been made:

The reservoir will be maintained with the approximate reservoir management cut and elevation levels shown as the green shaded area in Figure 4.6-1 **for Option 1 and Figure 4.6-2 for Option 2.** This will include the eastern branch and a portion of the upstream and downstream ends of the western branch every year for total reservoir management acreage of approximately 50.78 acres **for Option 1 and 52.57 acres for Option 2.** The access roads will be maintained to provide proper road width for access.

416 In the title for Figure 4.6-1, the following edit has been made:

Figure 4.6-1: Alternative 3, Configuration D, Option 1 Sediment Removal and Reservoir Management Areas

417 The following Figure has been added:

Figure 4.6-2: Alternative 3, Configuration D, Option 2 Sediment Removal and Reservoir Management Areas

418 In the 3rd paragraph under Sediment Excavation/Trucking Offsite, the following clarifications have been made:

As with the Proposed Project, it is estimated, based on past storm events, that sediment excavation/trucking offsite will be required to remove ~~typically an average of~~ 13,000 cy of sediment annually. Based on an estimated removal of 4,800 cy per day, it is expected this will occur over an estimated two-week period, working Monday through Friday. This sediment excavation activity will take place during the late summer/early fall following the vegetation maintenance.

418 In the 2nd paragraph under AESTHETICS-1, the following additions have been made:

Sediment removal activities associated with Alternative 3, Configuration D will change the visual characteristics of the reservoir through the removal of sediment and associated vegetation in the reservoir. These changes will be similar to the Proposed Project at the south end of the reservoir; however, these changes will be reduced in magnitude in comparison to the Proposed Project, as Alternative 3, Configuration D, **Option 1** will leave a greater area along the west and east sides of the reservoir and the area between the two branches undisturbed. **Alternative 3, Configuration D, Option 2 changes will be reduced in magnitude in comparison to the Proposed Project, as Alternative 3, Configuration D, Option 2 will leave a greater area along the east side and a large, contiguous area on the west side of the reservoir undisturbed.**

419 In Table 4.6-1, the following clarification has been made:

Table 4.6-1: Visual Analysis – Sediment Removal Visual Change

Viewpoint No. (Location, pole, etc.)	Viewpoint		Visual Change				
	Location	Direction Facing	Type of Visual Change	Visual Contrast	Project Dominance	View Blockage	Overall Visual Change
View 1	Bench near the west side of the dam (near La Cañada Verdugo Road)	East	Area of vegetation and soil removal reduced in comparison to the Proposed Project. Under Option 1 , large swaths of existing vegetation and topography will remain in the center and on the east and west sides of the Proposed Project site. Under Option 2, large swaths of existing vegetation and topography will remain on the east and west sides of the Proposed Project site. Removal activities will occur seasonally over a five-year timeframe.	Moderate-High	Moderate	Low	Moderate
View 2	Top of dam	North	Area of vegetation and soil removal reduced in comparison to the Proposed Project. Under Option 1 , large swaths of existing vegetation and topography will remain in the center and on the east and west sides of the Proposed Project site. Under Option 2, large swaths of existing vegetation and topography will remain on the east and west sides of the Proposed Project site. Removal activities will occur seasonally over a five-year timeframe.	Moderate-High	High	Low	Moderate-High
View 3	East of dam near trail	West	Area of vegetation and soil removal reduced in comparison to the Proposed Project. Under Option 1 , large swaths of existing vegetation and topography will remain in the center and on the east and west sides of the Proposed Project site. Under Option 2, large swaths of existing vegetation and topography will remain on the east and west sides of the Proposed Project site. Removal activities will occur seasonally over a five-year timeframe.	Moderate-High	Moderate	Low	Moderate
View 4	Normandy Court	North	Area of vegetation and soil removal reduced in comparison to the Proposed Project. Under Option 1 , large swaths of existing vegetation and topography will remain in the center and on the east and west sides of the Proposed Project site. Under Option 2, large swaths of existing vegetation and topography will remain on the east and west sides of the Proposed Project site. Removal activities will occur seasonally over a five-year timeframe.	Moderate-High	Moderate	Low	Moderate
View 5	Windsor Parking Lot	Southwest	Area of vegetation and soil removal reduced in comparison to the Proposed Project. Under Option 1 , large swaths of existing vegetation and topography will remain in the center and on the east and west sides of the Proposed Project site. Under Option 2, large swaths of existing vegetation and topography will remain on the east and west sides of the Proposed Project site. Removal activities will occur seasonally over a five-year timeframe.	Moderate	Moderate	Low	Moderate

420 In the 3rd paragraph under AESTHETICS-1, the following additions have been made:

As with the Proposed Project, sediment removal activities associated with Alternative 3, Configuration D, **Option 1 and Alternative 3, Configuration D, Option 2** will not result in obstruction or blockage of views due to the large difference in elevation between viewpoints and the Proposed Project site.

420 In the 5th paragraph under AESTHETICS-1, the following additions have been made:

With sediment removal under Alternative 3, Configuration D, **Option 1**, the topography of the reservoir will be lower, especially at the south end of the reservoir and within the two branches. **Vegetation within the excavation limits will be removed. With sediment removal under Alternative 3, Configuration D, Option 2, the topography of the reservoir will be lower, especially at the south end of the reservoir and within the branch located in the eastern portion of the reservoir.** These elements will result in a high degree of contrast from existing visual characteristics and will result in a potentially significant impact to scenic vistas. These contrasting elements will be highly visible for Viewpoints 1 through 3. For Viewpoints 1 and 3, however, the co-dominant features of Devil's Gate Dam, the reservoir maintenance roads, electrical lines, the debris boom line, and other less dominant features of the San Gabriel Mountains, Oak Grove Drive, JPL facilities, and residential areas will remain unchanged. In addition, **for Alternative 3, Configuration D, Option 1**, the existing vegetation along the west and east sides of the reservoir and the area between the two branches will not be removed and will share dominance with the dam and the excavation area. **For Alternative 3, Configuration D, Option 2, the existing vegetation along the east side of the reservoir and a large, contiguous area in the western portion of the reservoir adjacent to the east branch will not be removed and will share dominance with the dam and the excavation area.**

421 In the 2nd and 3rd paragraph under Reservoir Management, the following details have been added:

Visual simulations were created for Viewpoints 1 through 4 to portray the expected conditions under reservoir management for this Alternative (see Figure 4.6-3, Figure 4.6-4, ~~and~~ Figure 4.6-5, **Figure 4.6-6, and Figure 4.6-7**). Visual simulations were not created for Viewpoint 5 due to dominance of other visual elements (spreading grounds, JPL facilities). As with the Proposed Project, reservoir management will not result in obstruction or blockage of views. Construction equipment will also be visible in the basin but only for short periods of time.

After completion of the proposed sediment removal activities associated with Alternative 3, Configuration D, the disturbed areas outside the reservoir management area are expected to experience natural regrowth with native vegetation, primarily Riparian Herbaceous vegetation. The area available for regrowth will be greater for this alternative than for either reservoir management option under the Proposed Project. Under Alternative 3, Configuration D, **Option 1**, approximately 25.21 acres of previously disturbed area will have natural vegetation regrowth; and 50.78 acres of vegetation will be maintained annually. In addition, 44.43 acres that were not disturbed during sediment removal will remain undisturbed. **Under Alternative 3, Configuration D,**

Option 2, approximately 18.43 acres of previously disturbed area will have natural vegetation regrowth; and 52.57 acres of vegetation will be maintained annually. In addition, 49.42 acres that were not disturbed during sediment removal will remain undisturbed. In contrast, under the Proposed Project's reservoir management Option 1, approximately 120.42 acres of vegetation will be maintained annually. Under the Proposed Project's reservoir management Option 2, 33.97 acres of previously disturbed area will have natural vegetation regrowth and 91.28 acres of vegetation will be maintained annually.

424 In the title for Figure 4.6-3, the following edit has been made:

Figure 4.6-3: Alternative 3, Configuration D, Option 1 Viewpoint 1 Reservoir Management Conditions

425 In the title for Figure 4.6-4, the following edit has been made:

Figure 4.6-4: Alternative 3, Configuration D, Option 1 Viewpoint 2 Reservoir Management Conditions

426 In the title for Figure 4.6-5, the following edit has been made

Figure 4.6-5: Alternative 3, Configuration D, Option 1 Viewpoint 3 Reservoir Management Conditions

427 In the title for Figure 4.6-6, the following edit has been made:

Figure 4.6-6: Alternative 3, Configuration D, Option 1 Viewpoint 4 Reservoir Management Conditions

428 The following Figure has been added:

Figure 4.6-7: Alternative 3, Configuration D, Option 2 Viewpoint 4 Reservoir Management Conditions

431 In the 5th paragraph under Aesthetics-3, the following details have been added:

Although the sediment removal associated with this alternative will result in a potentially significant impact to the visual character of the Proposed Project site, the degree of contrast will be reduced in comparison to the Proposed Project due to the reduction in excavation area and associated sediment removal activities. In addition **for Alternative 3, Configuration D, Option 1**, approximately 44.43 acres of the approximately 120.42 acres of the Proposed Project site will be left undisturbed. This will include swaths along the west and east sides of the site and in the center of the site between the two branches. **For Alternative 3, Configuration D, Option 2, approximately 49.42 acres of the approximately 120.42 acres of the Proposed Project site will be left undisturbed. This will include a large swath along the east side of the reservoir and a large, contiguous area in the western portion of the reservoir adjacent to the east branch.** With areas of undisturbed vegetation left throughout, the site will more closely

resemble the mix of disturbed and vegetated areas found under existing conditions than with the Proposed Project.

433 In the 2nd paragraph under AIR QUALITY-1, the following clarifications have been made:

As with the Proposed Project (see Section 3.5.6), Alternative 3, Configuration D will be consistent with the second through fourth criteria but will not be consistent with the first criterion. This is due to emissions of NO_x exceeding the Daily Regional Threshold during sediment removal, resulting in a potentially significant impact. Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of Alternative 3, Configuration D's combined NO_x emissions during sediment removal. ~~Implementation of these mitigation measures may not be feasible, however, while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, Alternative 3, Configuration D could result in a significant impact.~~ **Therefore, impacts during sediment removal will be less than significant.** This impact will be reduced in comparison to the Proposed Project due to the reduction in excavation area and associated sediment removal activities.

433 In the 1st paragraph under Mitigation Measures, the following clarification has been made:

MM AQ-1: LACFCD shall require all construction contractors during the sediment removal phase of the Proposed Project to use **only** sediment removal dump trucks that meet EPA's emission standards for Model Year 2007 **or later** ~~as reasonably feasible~~.

433 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Implementation of these mitigations would reduce the combined NO_x emissions of Alternative 3, Configuration D during the sediment removal phase. ~~While every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, this impact remains potentially significant and unavoidable.~~

434 In the 1st paragraph under AIR QUALITY-2, the following clarifications have been made:

As with the Proposed Project, under Alternative 3, Configuration D emissions of NO_x exceed the Daily Regional Threshold during sediment removal, resulting in a potentially significant impact. Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of the combined NO_x emissions of Alternative 3, Configuration D during sediment removal. Implementation of these mitigations would reduce the Proposed Project's combined NO_x emissions during the sediment removal phase; ~~however, while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, Alternative 3, Configuration D will result in a potentially significant impact.~~ This impact will be reduced in comparison to the Proposed Project due to the reduction in excavation area and associated sediment removal activities.

435 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Sediment removal will not exceed any standard SCAQMD Regional Threshold except for combined NO_x emissions. Implementation of these mitigations would reduce the combined NO_x emissions of Alternative 3, Configuration D during the sediment removal phase; ~~however, while every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains potentially significant and unavoidable.~~

436 In the 1st paragraph under Cumulative Health Impacts, the following clarifications have been made:

As with the Proposed Project, Alternative 3, Configuration D with Mitigation Measures MM AQ-1 and MM AQ-2, significance threshold would not be exceeded for emissions of particulate matter and CO; and no significance threshold would be exceeded during reservoir management under either option. ~~While every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains potentially significant and unavoidable.~~ **Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of NO_x emissions and will reduce the NO_x emissions to a level of less than significant for the sediment removal phase.**

436 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Sediment removal will not exceed any localized significance threshold except for combined NO_x emissions. Implementation of these mitigations would reduce the combined NO_x emissions of Alternative 3, Configuration D during the sediment removal phase; ~~however, while every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~

438 In the 1st paragraph under BIOLOGY-1, the following addition has been made:

As shown in Figure 4.6-8: Alternative 3, Configuration D, **Option 1** Sediment Removal Vegetation Communities Impacts **and Figure 4.6-9: Alternative 3, Configuration D, Option 2 Sediment Removal Vegetation Communities Impacts** and Table 4.6-5: Alternative 3 Configuration D, Sediment Removal Impacts to Vegetation Communities, , potential impacts to vegetation communities will be reduced in comparison to the Proposed Project due to the reduction in area disturbed during excavation and associated sediment removal activities.

439 In Table 4.6-5, the following clarification and additions have been made:

Vegetation Communities	Estimated Acres of Vegetation Removed During Sediment Removal		
	Proposed Project	Alternative 3 Configuration D, Option 1	Alternative 3 Configuration D, Option 2
Riversidean Alluvial Fan Sage Scrub	1.1	0.4	0.4
Coastal Sage Scrub California Sagebrush – California Buckwheat Scrub	3.1	2.1	0.9
Scoured	26.5	21.0	22.6
Ornamental Landscaping Escaped Cultivars	0.4	0.2	0.2
Riparian Woodland	51.4	28.9	29.8
Mustard and Annual Brome Semi-Natural Herbaceous Stand Ruderal	22.8	14.8	12.1
Mule Fat Scrub Mule Fat Thickets	11.19.3	6.14.3	3.7
Disturbed	1.9	2.0	1.1
Riparian Herbaceous	1.8	1.8	2.0

440 In the 2nd paragraph under Sensitive Wildlife, the following additions have been made:

Of the approximately 120.42 acres that will be disturbed under the Proposed Project, approximately 44.43 acres, or 36 percent, will be left undisturbed under Alternative 3, Configuration D, **Option 1**. These undisturbed areas will include swaths along the west and east sides of the site and in the center of the site between the two branches. These undisturbed areas include potential habitat for the five special status species.

440 In the 3rd and 4th paragraph under Sensitive Wildlife, the following additions have been made:

As shown in Figure 4.6-8 and Table 4.6-3, potential impacts to sensitive wildlife will be reduced in comparison to the Proposed Project due to the reduction in habitat disturbed during sediment removal activities. Disturbance of habitat for the least Bell's vireo within Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~ communities will be reduced by approximately 22.5 acres (44 percent) and 5.0 acres (54 percent), respectively, as compared to the Proposed Project.

Disturbance of habitat for the yellow warbler within the Riparian Woodland community will be reduced by approximately 22.54 acres (44 percent), as compared to the Proposed Project. ~~Impacts to Riparian Herbaceous will be the same as for the Proposed Project.~~

440 In the 5th paragraph under Sensitive Wildlife, the following additions have been made:

Of the approximately 120.42 acres that will be disturbed under the Proposed Project, approximately 50.42 acres, or 42 percent, will be left undisturbed under Alternative 3, Configuration D, Option 2. These undisturbed areas will include a swath along the east side of the site and a large, contiguous area in the western portion of the reservoir west of the proposed excavation. These undisturbed areas include potential habitat for the six special status species.

As shown in Figure 4.6-8 and Table 4.6-3, potential impacts to sensitive wildlife will be reduced in comparison to the Proposed Project due to the reduction in habitat disturbed during sediment removal activities. Disturbance of habitat for the least Bell's vireo within Riparian Woodland and Mule Fat Thickets communities will be reduced by approximately 21.6 acres (42 percent) and 7.6 acres (82 percent), respectively, as compared to the Proposed Project.

Disturbance of habitat for the yellow warbler within the Riparian Woodland community will be reduced by approximately 21.6 acres (42 percent), as compared to the Proposed Project.

441 In the title for Figure 4.6-8, the following revision has been made:

Figure 4.6-8: Alternative 3, Configuration D, Option 1 Sediment Removal Vegetation Communities Impacts

441 Figure 4.6-8 was revised to reflect changes to the naming of vegetation communities.

442 The following Figure has been added:

Figure 4.6-9: Alternative 3, Configuration D, Option 2 Sediment Removal Vegetation Communities Impacts

443 In the 1st paragraph under Reservoir Management, the following revisions have been made:

Figure 4.6-8: Alternative 3, Configuration D, **Option 1** Sediment Removal Vegetation Communities Impacts **and Figure 4.6-9: Alternative 3, Configuration D, Option 2 Sediment Removal Vegetation Communities Impacts** shows expected conditions of the vegetation communities under reservoir management for Alternative 3, Configuration D, **Option 1 and Alternative 3, Configuration D, Option 2, respectively**, in comparison to the Proposed Project. As shown below, Alternative 3, Configuration D will result in a greater diversity of vegetation communities, including a greater amount of Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~. Under Alternative 3, Configuration D, a greater area of the Proposed Project site will be left undisturbed during reservoir management, approximately 69.64 acres **under Option 1 and 67.85 acres under Option 2**. In contrast, under the Proposed Project's reservoir management Option 1, the whole Proposed Project site, approximately 120.42 acres, will be disturbed annually. Under the Proposed Project's reservoir management Option 2, 33.97 acres will be left undisturbed during reservoir management.

The reservoir management area for Alternative 3, Configuration D is expected to be composed of Riparian Herbaceous and **Mustard and Annual Brome Semi-Natural Herbaceous Stand** ~~ruderal~~ communities. Streams and seasonal ponds will be available depending upon where sediment accumulates and the amount of flows, rainfall, and runoff. Special status species have the potential to use the reservoir management area.

444 Figure 4.6-10 was revised to reflect changes to the naming of vegetation communities.

444 The title for Figure 4.6-10 has been revised:

Figure 4.6-10: Alternative 3, Configuration D, Option 1 Conditions Under Reservoir Management

445 The following Figure has been added:

Figure 4.6-11: Alternative 3, Configuration D, Option 2 Conditions Under Reservoir Management

446 In the 1st paragraph under Mitigation Measures, the following details have been added:

MM BIO – 1: A qualified biological monitor shall be present during initial ground- or vegetation-disturbing project-related activities **to provide protection measures and monitor for wildlife in harm's way. This includes initial ground- or vegetation-disturbing project-related activities at the annual start of each year of sediment removal or maintenance activities.** Following initial project-related activities, a qualified monitoring biologist shall be present as necessary to maintain the implemented protection measures and monitor for additional species in harm's way. **These protection measures shall include, as appropriate: redirecting the wildlife, identifying areas that may require exclusionary devices (e.g., fencing), or capturing and relocating wildlife outside the work area. Any captured species shall be relocated to adjacent appropriate habitat that is contiguous to adjacent habitat and not impacted by project-related disturbance activities.**

446 In the 3rd paragraph under Mitigation Measures, the following detail has been added:

MM BIO – 3: Within 90 days prior to ground-disturbing activities, a preconstruction survey shall be conducted by a qualified biologist for the presence of any sensitive species in harm's way, including coast range newt, the southwestern pond turtle, and the two-striped garter snake. If sensitive species are observed in harm's way, the qualified biologist will develop and implement appropriate protection measures for that species. These protection measures shall include, as appropriate: redirecting the species, ~~constructing~~ ~~construction~~ ~~of~~ exclusionary devices (e.g., fencing), or ~~capturing~~ ~~capture~~ ~~and~~ ~~relocating~~ ~~relocation~~ ~~wildlife~~ outside the work area. Preconstruction surveys shall be repeated annually for the duration of the sediment removal. **Observations of special status species made during these surveys shall be recorded onto a CNDDB field data sheet and submitted to CDFW for inclusion into the CNDDB.**

447

In the 7th paragraph under Mitigation Measures, the following details have been added:

MM BIO – 5: Within 30 days prior to commencement of vegetation or structure removal activities, a preconstruction bat survey shall be conducted by a qualified biologist for the presence of any roosting bats. **Acoustic recognition technology shall be used if feasible and appropriate.** If either a bat maternity roost or hibernacula (structures used by bats for hibernation) **are** present, a qualified biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. These protection measures shall include, as appropriate, safely evicting non-breeding bat hibernacula, establishment of avoidance buffers, or replacement of roosts at a suitable location. **These measures shall also include as appropriate:**

- **To the extent feasible, trees that have been identified as roosting sites shall be removed or relocated between October 1 and February 28.**
- **When trees must be removed during the maternity season (March 1 to September 30), a qualified bat specialist shall conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.**
- **Trees identified as potentially supporting an active nursery roost shall be inspected by a qualified biologist no greater than 7 days prior to tree disturbance to determine presence or absence of roosting bats.**
- **Trees determined to support active maternity roosts will be left in place until the end of the maternity season (September 30).**
- **If bats are not detected in a tree, but the qualified biologist determines that roosting bats may still be present, trees shall be removed as follows:**
 - **Pushing a tree down with heavy machinery instead of felling the tree with a chainsaw**
 - **First pushing the tree lightly 2 to 3 times with a pause of 30 seconds between each nudge to allow bats to become active, then pushing the tree to the ground slowly**
 - **Allowing the tree to remain in place for 24 to 48 hours until inspected by the qualified biologist for presence or absence of roosting bats**
- **The qualified biologist shall document all bat survey, monitoring, and protection measure activities and prepare a summary report for LACFCD.**

448

In the 1st paragraph under BIOLOGY-2, the following additions have been made:

Alternative 3, Configuration D, **Option 1 and Alternative 3 Configuration D, Option 2** will impact approximately 0.4 acre of Riversidean Alluvial Fan Sage Scrub within the Proposed Project site. Impacts to Riversidean Alluvial Fan Sage Scrub will result in a potentially significant impact requiring mitigation; however, disturbance of this community will be reduced by approximately 0.7 acres (64 percent) as compared to the Proposed Project. To minimize

impacts due to loss of Riversidean Alluvial Fan Sage Scrub, Mitigation Measure MM BIO-6 has been provided. Removing the sediment will benefit the alluvial fan sage scrub since the habitat is currently buried under sediment and therefore considered poor quality. With implementation of this mitigation measure, impacts to Riversidean Alluvial Fan Sage Scrub will be reduced to a level below significance.

448 In the 2nd paragraph under BIOLOGY-2, the following clarifications have been made:

Alternative 3, Configuration D, Option 1 will impact approximately 28.9 acres of Riparian Woodland and ~~4.3~~ **6.1** acres of **Mule Fat Thickets** ~~Mule Fat Scrub~~ within the Proposed Project site, **while Alternative 3, Configuration D, Option 2 will impact approximately 28.9 acres of Riparian Woodland and 3.7 acres of Mule Fat Thickets.** Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~ are rare plant communities that provide nesting habitat for riparian species. Impacts to these habitats will result in a potentially significant impact; however, disturbance of Riparian Woodland and **Mule Fat Thickets under Option 1** ~~Mule Fat Scrub~~ will be reduced by approximately 22.5 acres (44 percent) and 5.0 acres (54 percent), respectively, as compared to the Proposed Project. **In comparison, disturbance of Riparian Woodland and Mule Fat Thickets under Alternative 3, Configuration D, Option 2 will be reduced by approximately 22.5 acres (44 percent) and 7.4 acres (67 percent), respectively as compared to the Proposed Project.** To minimize impacts due to the loss of Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~, Mitigation Measures MM BIO-7 and MM BIO-8 have been provided. With implementation of this mitigation measure, impacts to Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~ will be reduced to a level below significance.

449 The title for Figure 4.6-12 has been revised:

Figure 4.6-12: Alternative 3, Configuration D, Option 1 Impacted Water Features

450 The following Figure has been added:

Figure 4.6-13: Alternative 3, Configuration D, Option 2 Impacted Water Features

451 In the 3rd paragraph under BIOLOGY-2, the following additions have been made:

Figure 4.6-12: Alternative 3, Configuration D, **Option 1** Impacted Water Features **and Figure 4.6-13: Alternative 3, Configuration D, Option 2** shows the water features that will be impacted. Compared to the Proposed Project, Alternative 3, Configuration D, **Option 1 and Alternative 3, Configuration D, Option 2** will reduce impacts to these water features by approximately 19 percent. To minimize impacts to jurisdictional waters found within these water features, Mitigation Measure MM BIO-8 has been provided. With implementation of this mitigation measure, impacts will be reduced to a level below significance

451 In MM BIO – 8, the following clarifications have been made:

MM BIO – 8: A combination of onsite and offsite habitat restoration, enhancement, and exotic removal shall be implemented by LACFCD at a 1:1 ratio for impacted sensitive habitat and jurisdictional waters. Habitat restoration/enhancement shall include use of willow cuttings and exotic species removal. **Non-native, weedy** ~~Ruderal~~ habitats within

the basin shall be utilized whenever possible as mitigation sites. This mitigation measure shall be monitored for success for five years following implementation. A report of the monitoring results shall be submitted annually, during the five years following implementation, to resource agencies as required by the Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement.

452 In the 1st paragraph under BIOLOGY-3, the following edits have been made:

Figures 4.6-12 and 4.6-13 above, show the water features that will be impacted by this alternative. Compared to the Proposed Project, Alternative 3, Configuration D will reduce impacts to these water features by approximately 19 percent. To minimize impacts to jurisdictional waters found within these water features, Mitigation Measure MM BIO-8 has been provided. With implementation of this mitigation measure, impacts will be reduced to a level below significance.

453 In the 1st paragraph under BIOLOGY-4, the following information has been added:

The Proposed Project area is predominantly open for wildlife movement and habitat connectivity. **Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area.** Sediment removal and reservoir management activities associated with Alternative 3, Configuration D will interfere temporarily with the movement of native resident or migratory wildlife species, resulting in a potentially significant impact. Reduction in sensitive habitat would interfere with use of the habitat for wildlife nursery sites, resulting in a potentially significant impact. **To minimize impacts to less than significant, Mitigation Measures MM BIO-1 through MM BIO-8 has been provided.** This impact will be reduced in comparison to the Proposed Project due to the reduction in area disturbed during sediment removal and both reservoir management options.

458 In the 1st paragraph under GHG EMISSIONS-1, the following information has been added:

Alternative 3, Configuration D will use the same amount and type of construction equipment as the Proposed Project and involve the same number of truck trips on a daily basis for sediment removal and reservoir management; however, sediment removal under this Alternative is expected to have a shorter duration than the Proposed Project due to the reduced amount of sediment to be removed. **Use of sediment removal dump trucks that meet EPA's emission standards for Model Year 2007 or later and use of off-road equipment that meets, at a minimum, EPA's emission standards for Tier 3 equipment, would result in a reduction of GHG emissions.** As noted in Section 3.6, generation of greenhouse gas emissions under the Proposed Project is not "cumulatively considerable" and is therefore less than significant under CEQA. Alternative 3, Configuration D will have the same amount of daily equipment

usage/truck traffic and reduced overall sediment removal duration; therefore, this alternative will generate less greenhouse gas emissions than the Proposed Project, which will not be “cumulatively considerable,” and is therefore less than significant under CEQA.

473 In the 2nd paragraph under RECREATION-1, the following detail has been added:

As with the Proposed Project, under Alternative 3, Configuration D sediment removal will occur over the course of five years. During this, most of the Proposed Project site will be closed to public use from the dam face to the edge of this Alternative's excavation limit boundaries (see Figure 4.6-1 **and Figure 4.6-2**). Alternative 3, Configuration D will have a potential impact on recreational opportunities through temporarily restricted access to trails and long-term alteration of the landscape. Maintenance roads within the basin are used by the LACFCD, Southern California Edison (SCE), and the City of Pasadena, among others, for operations and maintenance of Devil's Gate Reservoir and other facilities in the area. 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.

474 In the 3rd paragraph under RECREATION-1, the following detail has been added:

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, **MACH 1**, or Tom Sawyer Camp.

474 In the 5th paragraph under RECREATION-1, the following information has been added:

Figure 4.6-14: Alternative 3, Configuration **D, Option 1** Impacts to Designated Trails shows the location of the different access conditions during sediment removal **for Alternative 3, Configuration D, Option 1**. **Figure 4.6-15: Alternative 3, Configuration D, Option 2 Impacts to Designated Trails shows the location of the different access conditions during sediment removal for Alternative 3, Configuration D, Option 2**.

474 In the 6th paragraph under RECREATION-1, the following details have been added:

Indirect impacts to recreation associated with sediment removal under Alternative 3, Configuration D will be reduced in comparison to the Proposed Project due to the reduction in excavation area and associated sediment removal activities. In addition, **for Alternative 3, Configuration D, Option 1** approximately 44.43 acres of the approximately 120.42 acres of the Proposed Project site will be left undisturbed. This will include swaths along the west and east sides of the site and in the center of the site between the two excavated branches. **For Alternative 3, Configuration D, Option 2 approximately 50.42 acres of the approximately 120.42 acres of the Proposed Project site will be left undisturbed. This will include a swath along the east side of the site as well as a large, contiguous area on the west side of the reservoir.** These areas of undisturbed vegetation left throughout will serve to screen some of the ongoing recreation uses from the sediment removal activities and associated construction-related emissions, noise, dust, and visual impacts.

475 The title for Figure 4.6-14 has been revised:

Figure 4.6-14: Alternative 3, Configuration D, Option 1 Impacts to Designated Trails

476 The following Figure has been added:

Figure 4.6-15 Alternative 3, Configuration D, Option 2 Impacts to Designated Trails

479 In the 1st and 2nd paragraph under TRANSPORTATION-1, the following clarifications have been made:

Truck traffic associated with Alternative 3, Configuration D is expected to adhere to traffic regulations; however, during sediment removal, Alternative 3, Configuration D truck traffic is expected to impact traffic LOS on the existing roadway network. Potential impacts regarding existing LOS are discussed under TRANSPORTATION-2 below. This increase in traffic would result in **temporary** significant impacts to the efficiency of the circulation system. Implementation of Mitigation Measures MM TRA-1 and TRA-2 would reduce this impact but not to a level of less than significant.

Sediment removal and associated transportation under this Alternative could potentially have a shorter duration than the Proposed Project, due to the reduced amount of sediment to be removed. Other potential impact reduction measures discussed under TRANSPORTATION-2, below, could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this **temporary** impact could remain potentially significant.

480 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce impacts to traffic and circulation but not to a level of less than significant. Other potential impact reduction measures discussed under TRANSPORTATION-2, below, could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this **temporary** impact could remain potentially significant. ***No significant traffic impacts would occur under reservoir management.***

481 In the 4th, 5th, and 6th paragraphs under TRANSPORTATION-2, the following clarifications have been made:

The impact reduction measure discussed above cannot be legally imposed by the LACFCD since the location is under the jurisdiction of the City of Pasadena. Every reasonable effort will be made to coordinate with and receive approval to implement this impact reduction measure; however, LACFCD cannot guarantee that this impact reduction measure will be implemented. Therefore this **temporary** impact would remain potentially significant.

The Irwindale Avenue/Foothill Boulevard intersection is anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in a **temporary** significant impact. Mitigation Measure MM TRA-1 would reduce the impact to the Irwindale Avenue/Foothill Boulevard intersection to less than significant.

The Figueroa St/Scholl Canyon Road and SR-134 westbound ramps intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact.

482 In the 7th, 8th, and 9th paragraphs under TRANSPORTATION-2, the following clarifications have been made:

Implementation of the impact reduction measure discussed above would reduce the impact to the Figueroa St/Scholl Canyon Road and SR-134 westbound ramps intersection to less than significant. This impact reduction measure cannot be legally imposed by the LACFCD. Every reasonable effort will be made to coordinate with and receive approval to implement the impact reduction measure; however, LACFCD cannot guarantee that the measure will be implemented therefore this **temporary** impact could remain significant.

The Glenoaks Boulevard and Osborne Street intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact.

The Sheldon Street and San Fernando Road intersection and the Branford Street and San Fernando Road intersection are anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in **temporary** significant impacts. Mitigation Measure MM TRA-2 would reduce the impacts to less than significant.

482 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since

the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these **temporary** impacts could remain potentially significant. **No significant traffic impacts would occur under reservoir management.**

483 In the 1st paragraph under TRANSPORTATION-3, the following clarifications have been made:

Implementation of Alternative 3, Configuration D may include impact reduction measures described above that would require modifications to the existing roadway network. These modifications would consist of roadway restriping to reduce potential traffic impacts to a level less than significant. These changes would not alter existing roadway ~~design~~ **use** and would be implemented consistently with all applicable traffic safety standards. Alternative 3, Configuration D is limited to excavation and transportation of sediment that has accumulated in Devil's Gate Reservoir and would not introduce any new uses that would be incompatible **or substantially increase hazards** with the existing roadway system. Therefore, impacts related to traffic hazards would be less than significant.

485 In the 1st paragraph under TRANSPORTATION-5, the following clarification has been made:

Alternative 3, Configuration D would be confined to the roadway network described in Section 3.16.2 and would not adversely affect alternative modes of public transportation such as light rail. Implementation of Alternative 3, Configuration D would not require closure of any bus stops or disrupt any existing bus routes. The degrading of LOS at intersections, freeway segments, and freeway on- and off-ramps, described above under TRANSPORTATION-2, could affect buses using the existing roadway network. This would be a potentially **temporary** significant impact.

485 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these **temporary** impacts could remain potentially significant. **No significant traffic impacts would occur under reservoir management.**

486 In the 3rd paragraph under UTILITIES-1, the following clarification has been made:

During reservoir management, Alternative 3, Configuration D will not result in or require the construction of new or expansion of existing stormwater drainage systems. Sediment that accumulates after the proposed removal will be removed through FAST operations or through mechanical excavation and trucking. The FAST operations are expected to be similar to historic FAST operations, and sediment fines discharged through FAST operations will be transported during storm flows to the Pacific Ocean via Arroyo Seco and the Los Angeles River. No impacts to stormwater facilities are expected during FAST operations. Any necessary mechanical removal during reservoir management is expected to be small (**typically** 13,000 cy per year). Impacts to stormwater facilities during mechanical removal will be avoided through compliance with City regulations regarding stormwater facilities and implementation of LACDPW BMPs.

Section 4.7 Alternative 4, Sluicing

Page Clarification/Revision

496 In the 2nd paragraph under AIR QUALITY-1, the following clarifications have been made:

As with the Proposed Project (see Section 3.5.6), Alternative 4, Sluicing will be consistent with the second through fourth criteria but would potentially not be consistent with the first criterion, as emissions of NO_x could exceed the Daily Regional Threshold during sediment removal from the Arroyo Seco Channel, the Los Angeles River, or the Port of Long Beach. ~~Therefore, Alternative 4, Sluicing could result in a potentially significant impact.~~ **Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of NO_x emissions to less than the SCAQMD Regional Threshold for NO_x. Therefore, impacts during sediment removal will be less than significant.** This impact will be increased in comparison to the Proposed Project due to the potentially longer distance of trucking during sediment removal activities from downstream portions of the channel.

496 In the 1st paragraph under Mitigation Measures, the following clarification has been made:

MM AQ-1: LACFCD shall require all construction contractors during the sediment removal phase of the Proposed Project to use **only** sediment removal dump trucks that meet EPA's emission standards for Model Year 2007 **or later** ~~as reasonably feasible~~.

496 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Implementation of these mitigations would reduce combined NO_x emissions from Alternative 4, Sluicing during the sediment removal phase; ~~however, while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual~~

vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant.

497 In the 1st paragraph under AIR QUALITY-2, the following clarifications have been made:

As with the Proposed Project, emissions of NO_x under Alternative 4, Sluicing could exceed the Daily Regional Threshold during the removal of sediment from further downstream, resulting in a potentially significant impact. Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of combined NO_x emissions from Alternative 4, Sluicing during sediment removal. ~~While every reasonable effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant.~~ Therefore, this impact **will be reduced to less than significant** ~~remains significant and unavoidable. Therefore, Alternative 4, Sluicing could result in a potentially significant impact.~~ This impact will be increased in comparison to the Proposed Project due to the longer distances required for the trucking sediment offsite.

497 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Sediment removal will not exceed any standard SCAQMD Regional Threshold except for combined NO_x emissions. Implementation of these mitigations would reduce combined NO_x emissions from Alternative 4, Sluicing during the sediment removal phase; ~~however, while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~

498 In the 1st paragraph under Cumulative Health Impacts, the following clarifications have been made:

As with the Proposed Project, for Alternative 4, Sluicing with Mitigation Measures MM AQ-1 and MM AQ-2, a significance threshold would not be exceeded for emissions of particulate matter and CO; and no significance threshold would be exceeded during reservoir management under either option. ~~While every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~ **Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of NO_x emissions and will reduce the NO_x emissions to a level of less than significant for the sediment removal phase.**

498 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Sediment removal will not exceed any localized significance threshold except for combined NO_x emissions. Implementation of these mitigations would reduce combined NO_x emissions from Alternative 4, Sluicing during the sediment removal phase; ~~however, while every effort will be made to strive for the newest vehicles/equipment,~~

~~the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~

502 In the 1st paragraph under Mitigation Measures, the following details have been added:

MM BIO – 1: A qualified biological monitor shall be present during initial ground- or vegetation-disturbing project-related activities *to provide protection measures and monitor for wildlife in harm's way. This includes initial ground- or vegetation-disturbing project-related activities at the annual start of each year of sediment removal or maintenance activities.* Following initial project-related activities, a qualified monitoring biologist shall be present as necessary to maintain the implemented protection measures and monitor for additional species in harm's way. *These protection measures shall include, as appropriate: redirecting the wildlife, identifying areas that may require exclusionary devices (e.g., fencing), or capturing and relocating wildlife outside the work area. Any captured species shall be relocated to adjacent appropriate habitat that is contiguous to adjacent habitat and not impacted by project-related disturbance activities.*

503 In the 3rd paragraph under Mitigation Measures, the following detail has been added:

MM BIO – 3: Within 90 days prior to ground-disturbing activities, a preconstruction survey shall be conducted by a qualified biologist for the presence of any sensitive species in harm's way, including coast range newt, the southwestern pond turtle, and the two-striped garter snake. If sensitive species are observed in harm's way, the qualified biologist will develop and implement appropriate protection measures for that species. These protection measures shall include, as appropriate: redirecting the species, ~~constructing construction of~~ exclusionary devices (e.g., fencing), or ~~capture and relocating relocation~~ *capturing and relocating wildlife* outside the work area. Preconstruction surveys shall be repeated annually for the duration of the sediment removal. *Observations of special status species made during these surveys shall be recorded onto a CNDDB field data sheet and submitted to CDFW for inclusion into the CNDDB.*

503 In the 7th paragraph under Mitigation Measures, the following details have been added:

MM BIO – 5: Within 30 days prior to commencement of vegetation or structure removal activities, a preconstruction bat survey shall be conducted by a qualified biologist for the presence of any roosting bats. *Acoustic recognition technology shall be used if feasible and appropriate.* If either a bat maternity roost or hibernacula (structures used by bats for hibernation) *are* present, a qualified biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. These protection measures shall include, as appropriate, safely evicting non-breeding bat hibernacula, establishment of avoidance buffers, or replacement of roosts at a suitable location. *These measures shall also include as appropriate:*

- *To the extent feasible, trees that have been identified as roosting sites shall be removed or relocated between October 1 and February 28.*

- ***When trees must be removed during the maternity season (March 1 to September 30), a qualified bat specialist shall conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.***
- ***Trees identified as potentially supporting an active nursery roost shall be inspected by a qualified biologist no greater than 7 days prior to tree disturbance to determine presence or absence of roosting bats.***
- ***Trees determined to support active maternity roosts will be left in place until the end of the maternity season (September 30).***
- ***If bats are not detected in a tree, but the qualified biologist determines that roosting bats may still be present, trees shall be removed as follows:***
 - ***Pushing a tree down with heavy machinery instead of felling the tree with a chainsaw***
 - ***First pushing the tree lightly 2 to 3 times with a pause of 30 seconds between each nudge to allow bats to become active, then pushing the tree to the ground slowly***
 - ***Allowing the tree to remain in place for 24 to 48 hours until inspected by the qualified biologist for presence or absence of roosting bats***
- ***The qualified biologist shall document all bat survey, monitoring, and protection measure activities and prepare a summary report for LACFCD.***

505 In the 2nd paragraph under BIOLOGY-2, the following clarifications have been made:

This alternative will impact the same amount of Riparian Woodland and ***Mule Fat Thickets*** ~~Mule Fat Scrub~~ as the Proposed Project. Riparian Woodland and ***Mule Fat Thickets*** ~~Mule Fat Scrub~~ are rare plant communities that provide nesting habitat for riparian species. Impacts to these habitats will result in a potentially significant impact. To minimize impacts due to the loss of Riparian Woodland and ***Mule Fat Thickets*** ~~Mule Fat Scrub~~, Mitigation Measures MM BIO-7 and MM BIO-8 have been provided. With implementation of these mitigation measures, impacts to Riparian Woodland and ***Mule Fat Thickets*** ~~Mule Fat Scrub~~ will be reduced to a level below significance.

506 In the 3rd paragraph under Mitigation Measures, the following clarifications have been made:

MM BIO – 8: A combination of onsite and offsite habitat restoration, enhancement, and exotic removal shall be implemented by LACFCD at a 1:1 ratio for impacted sensitive habitat and jurisdictional waters. Habitat restoration/enhancement shall include use of willow cuttings and exotic species removal. **Non-native, weedy** ~~Ruderal~~ habitats within the basin shall be utilized whenever possible as mitigation sites. This mitigation measure shall be monitored for success for five years following implementation. A report of the monitoring results shall be submitted annually, during the five years following

implementation, to resource agencies as required by the Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement.

508 In the 1st paragraph under BIOLOGY-4, the following information has been added:

The Proposed Project area is predominantly open for wildlife movement and habitat connectivity. ***Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area.*** Sediment removal and reservoir management activities associated with Alternative 4, Sluicing will interfere temporarily with the movement of native resident or migratory wildlife species, resulting in a potentially significant impact. Reduction in sensitive habitat would interfere with use of the habitat for wildlife nursery sites, resulting in a potentially significant impact. ***To minimize impacts to less than significant, Mitigation Measures MM BIO-1 through MM BIO-8 has been provided.*** This impact will be similar in comparison to the Proposed Project due to the similarities in area disturbed during sediment removal and reservoir management Option 1.

514 In the 1st paragraph under GHG EMISSIONS-1, the following details have been added:

Alternative 4, Sluicing will use the same amount and type of construction equipment as the Proposed Project; however, sediment removal under this Alternative will not involve trucking of sediment offsite. The only material to be trucked offsite includes vegetation, which will be transported to Scholl Canyon Landfill. ***Use of sediment removal dump trucks that meet EPA's emission standards for Model Year 2007 or later and use of off-road equipment that meets, at a minimum, EPA's emission standards for Tier 3 equipment, would result in a reduction of GHG emissions.*** As noted in Section 3.6, generation of greenhouse gas emissions under the Proposed Project is not "cumulatively considerable" and is therefore less than significant under CEQA. Alternative 4, Sluicing will have the same amount of daily equipment usage but less truck traffic; therefore, this alternative will generate less greenhouse gas emissions than the Proposed Project, which will not be "cumulatively considerable," and is therefore less than significant under CEQA.

530 In the 4th paragraph under Recreation and Public Services, the following detail has been added:

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, ***MACH 1***, or Tom Sawyer Camp.

533 In the 1st and 2nd paragraphs of TRANSPORTATION-1, the following clarifications have been made:

Truck traffic associated with the Alternative 4, Sluicing is expected to adhere to traffic regulations. Potential impacts regarding existing LOS are discussed under

TRANSPORTATION-2 below. This increase in traffic would result in **temporary** significant impacts to the efficiency of the circulation system. Implementation of Mitigation Measures MM TRA-1 and TRA-2 would reduce this impact but not to a level of less than significant.

Other potential impact reduction measures discussed under TRANSPORTATION-2, below, could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this **temporary** impact could remain potentially significant.

535 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce impacts to traffic and circulation but not to a level of less than significant. Other potential impact reduction measures discussed under TRANSPORTATION-2, below, could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this **temporary** impact could remain potentially significant. ***No significant traffic impacts would occur under reservoir management.***

535 In the 2nd and 3rd paragraphs of TRANSPORTATION-2, the following clarifications have been made:

The Irwindale Avenue/Foothill Boulevard intersection is anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in a **temporary** significant impact. Mitigation Measure MM TRA-1 would reduce the impact to the Irwindale Avenue/Foothill Boulevard intersection to less than significant.

The Figueroa St/Scholl Canyon Road and SR-134 westbound ramps intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact.

535 In the 4th, 5th, and 6th paragraphs of TRANSPORTATION-2, the following clarifications have been made:

Implementation of the impact reduction measure discussed above would reduce the impact to the Figueroa St/Scholl Canyon Road and SR-134 westbound ramps intersection to less than significant. This impact reduction measure cannot be legally imposed by the LACFCD. Every reasonable effort will be made to coordinate with and

receive approval to implement the impact reduction measure; however, LACFCD cannot guarantee that the measure will be implemented therefore this **temporary** impact could remain significant.

The Glenoaks Boulevard and Osborne Street intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact.

The Sheldon Street and San Fernando Road intersection and the Branford Street and San Fernando Road intersection are anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in **temporary** significant impacts. Mitigation Measure MM TRA-2 would reduce the impacts to less than significant.

536 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these **temporary** impacts could remain potentially significant. ***No significant traffic impacts would occur under reservoir management.***

536 In the 1st and 2nd paragraphs of TRANSPORTATION-3, the following clarifications have been made:

Implementation of the Alternative 4, Sluicing may include impact reduction measures that would require modifications to the existing roadway network. Alternative 4, Sluicing is limited to excavation and transportation of vegetation that has accumulated in Devil's Gate Reservoir and would not introduce any new uses that would be incompatible ***or substantially increase hazards*** with the existing roadway system. Therefore, impacts related to traffic hazards would be less than significant.

If proper sediment transport does not occur under Alternative 4, Sluicing, sediment deposits will develop along the route to the ocean. This would result in need for sediment removal from the Arroyo Seco Channel, the Los Angeles River, or the Port of Long Beach, which will have impacts associated with transportation and traffic. Even if trucking of sediment further downstream is required, it would not introduce any uses that would be incompatible ***or substantially increase hazards*** with the existing roadway system; and it would have less than significant impacts.

538 In the 1st paragraph of TRANSPORTATION-5, the following clarification has been made:

Alternative 4, Sluicing would be confined to the roadway network described in Section 3.16.2 and would not adversely affect alternative modes of public transportation such as light rail. Implementation of Alternative 4, Sluicing would not require closure of any bus stops or disrupt any existing bus routes. The degrading of LOS at intersections, freeway segments, and freeway on- and off-ramps described above under TRANSPORTATION-2 could affect buses using the existing roadway network. This would be a **temporary** potentially significant impact.

538 In the 1st paragraph under Residual Impacts After Mitigation, the following clarification have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these **temporary** impacts could remain potentially significant. ***No significant traffic impacts would occur under reservoir management.***

Section 4.8 Alternative 5, Haul Route Alternative

Page Clarification/Revision

541 In the 3rd through 6th paragraphs under Sediment Disposal, the following revisions have been made:

Sediment Disposal Truck Routes

This Alternative analyzes the use of alternative routes for some of the segments of the sediment disposal truck routes.

Project Site and Freeway Access

The sediment disposal truck alternative routes to and from the Proposed Project Site and I-210 are shown in Figure 4.8-1: Haul Route To and From Proposed Site and I-210 Alternative, ***Option 1 and Figure 4.8-2: Haul Route To and From Proposed Site and I-210 Alternative, Option 2. Option 1 haul route*** will avoid La Cañada High School and Hillside School and Learning Center ***and also avoid the Berkshire Place and I-210 eastbound ramps intersection. Under the Proposed Project, this intersection was***

anticipated to operate at an unacceptable LOS during the AM peak hour, resulting in a significant impact. Option 2 haul route will avoid the use of Windsor Avenue.

For Option 1, as shown in Figure 4.8-1 trucks will access the Proposed Project site from I-210 by exiting Windsor Avenue/Arroyo Boulevard, turning right on eastbound Windsor Avenue, turning left onto northbound Oak Grove Drive, and then entering the east reservoir access road.

Loaded trucks will exit the reservoir on the improved, existing westerly access road, turning left onto southbound Oak Grove Drive, then right onto westbound Windsor Avenue, and then east onto I-210 east, to disposal sites in Azusa and Irwindale or I-210 west to the Sun Valley disposal sites.

Alternatively, for Option 2, as shown in Figure 4.8-2, trucks will access the Proposed Project site from I-210 by exiting at Berkshire Place, turning east onto Berkshire Place, turning right onto southbound Oak Grove Drive, then entering the reservoir by making a left onto the ramp on the east side of the reservoir.

Loaded trucks will exit the reservoir on the upgraded existing west side access road, turn right onto northbound Oak Grove Drive, then left onto westbound Berkshire Place, and then to I-210 eastbound to disposal sites in Azusa and Irwindale or to I-210 westbound to disposal sites in Sun Valley.

544 The following figure name was edited:

Figure 4.8-1: Haul Route To and From Proposed Site and I-210 Alternative, Option 1

545 The following figure was added:

Figure 4.8 – 2: Haul Route To and From Proposed Site and I-210 Alternative, Option 2

549 In the 2nd paragraph under Sediment Excavation/Trucking Offsite, the following clarifications have been made:

As with the Proposed Project, it is estimated, based on past storm events, that sediment excavation/trucking offsite will be required to remove ~~typically an average of~~ 13,000 cy of sediment annually. Based on an estimated removal of 4,800cy per day, it is expected this will occur over an estimated two-week period, working Monday through Friday. This sediment excavation activity will take place during the late summer/early fall following the vegetation maintenance.

554 In the 2nd paragraph under AIR QUALITY-1, the following clarifications have been made:

As with the Proposed Project (see Section 3.5.6), Alternative 5, Haul Route Alternative will be consistent with the second through fourth criteria but will not be consistent with the first criterion. This is due to emissions of NO_x exceeding the Daily Regional Threshold during sediment removal, resulting in a potentially significant impact. Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of Alternative 5, Haul Route Alternative's combined NO_x emissions during sediment removal; ~~however,~~

~~while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, impacts during sediment removal will be less than significant.~~ Therefore, Alternative 5, Haul Route Alternative could result in a potentially significant impact. This impact will be similar in comparison to the Proposed Project due to the identical excavation area and associated sediment removal activities.

555 In the 1st paragraph under Mitigation Measures, the following clarification has been made:

MM AQ-1: LACFCD shall require all construction contractors during the sediment removal phase of the Proposed Project to use **only** sediment removal dump trucks that meet EPA's emission standards for Model Year 2007 **or later** ~~as reasonably feasible~~.

555 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Implementation of these mitigations would reduce the Alternative 5, Haul Route Alternative's combined NO_x emissions during the sediment removal phase; ~~however, while every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~

555 In the 1st paragraph under AIR QUALITY-2, the following clarifications have been made:

As with the Proposed Project, under Alternative 5, Haul Route Alternative emissions of NO_x exceed the Daily Regional Threshold during sediment removal, resulting in a potentially significant impact. Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of Alternative 5, Haul Route Alternative's combined NO_x emissions during sediment removal; ~~however, while every reasonable effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce emissions to a level of less than significant. Therefore, Alternative 5, Haul Route Alternative will result in a potentially significant impact.~~ This impact will be similar in comparison to the Proposed Project due to the identical excavation area and associated sediment removal activities.

556 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Sediment removal will not exceed any standard SCAQMD Regional Threshold except for combined NO_x emissions. Implementation of these mitigations would reduce combined NO_x emissions for Alternative 5, Haul Route Alternative during the sediment removal phase; ~~however, while every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~

557 In the 1st paragraph under Cumulative Health Impacts, the following clarifications have been made:

As with the Proposed Project, Alternative 5, Haul Route Alternative with Mitigation Measures MM AQ-1 and MM AQ-2, a significance threshold would not be exceeded for emissions of particulate matter and CO; and no significance threshold would be exceeded during reservoir management under either option. ~~While every effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~ **Implementation of Mitigation Measures MM AQ-1 and MM AQ-2 will result in a reduction of NO_x emissions and will reduce the NO_x emissions to a level of less than significant for the sediment removal phase.**

557 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Sediment removal under Alternative 5, Haul Route Alternative will not exceed any localized significance threshold except for combined NO_x emissions. Implementation of these mitigations would reduce combined NO_x emissions of Alternative 5, Haul Route Alternative during the sediment removal phase; ~~however, while all effort will be made to strive for the newest vehicles/equipment, the actual vehicle/equipment fleet may not reach the levels required to reduce the NO_x emissions to a level of less than significant. Therefore, this impact remains significant and unavoidable.~~

561 In the 1st paragraph under Mitigation Measures, the following details have been added:

MM BIO – 1: A qualified biological monitor shall be present during initial ground- or vegetation-disturbing project-related activities **to provide protection measures and monitor for wildlife in harm's way. This includes initial ground- or vegetation-disturbing project-related activities at the annual start of each year of the sediment removal or maintenance activities.** Following initial project-related activities, a qualified monitoring biologist shall be present as necessary to maintain the implemented protection measures and monitor for additional species in harm's way. **These protection measures shall include, as appropriate: redirecting the wildlife, identifying areas that may require exclusionary devices (e.g., fencing), or capturing and relocating wildlife outside the work area. Any captured species shall be relocated to adjacent appropriate habitat that is contiguous to adjacent habitat and not impacted by project-related disturbance activities.**

561 In the 3rd paragraph under Mitigation Measures, the following detail has been added:

MM BIO – 3: Within 90 days prior to ground-disturbing activities, a preconstruction survey shall be conducted by a qualified biologist for the presence of any sensitive species in harm's way, including coast range newt, the southwestern pond turtle, and the two-striped garter snake. If sensitive species are observed in harm's way, the qualified biologist will develop and implement appropriate protection measures for that species. These protection measures shall include, as appropriate: redirecting the species, ~~constructing~~ ~~construction of~~ exclusionary devices (e.g., fencing), or **capturing**

and relocating wildlife outside the work area. Preconstruction **surveys** shall be repeated annually for the duration of the sediment removal. **Observations of special status species made during these surveys shall be recorded onto a CNDDB field data sheet and submitted to CDFW for inclusion into the CNDDB.**

562

In the 7th paragraph under Mitigation Measures, the following details have been added:

MM BIO – 5: Within 30 days prior to commencement of vegetation or structure removal activities, a preconstruction bat survey shall be conducted by a qualified biologist for the presence of any roosting bats. **Acoustic recognition technology shall be used if feasible and appropriate.** If either a bat maternity roost or hibernacula (structures used by bats for hibernation) **are** present, a qualified biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. These protection measures shall include, as appropriate, safely evicting non-breeding bat hibernacula, establishment of avoidance buffers, or replacement of roosts at a suitable location. **These measures shall also include as appropriate:**

- **To the extent feasible, trees that have been identified as roosting sites shall be removed or relocated between October 1 and February 28.**
- **When trees must be removed during the maternity season (March 1 to September 30), a qualified bat specialist shall conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.**
- **Trees identified as potentially supporting an active nursery roost shall be inspected by a qualified biologist no greater than 7 days prior to tree disturbance to determine presence or absence of roosting bats.**
- **Trees determined to support active maternity roosts will be left in place until the end of the maternity season (September 30).**
- **If bats are not detected in a tree, but the qualified biologist determines that roosting bats may still be present, trees shall be removed as follows:**
 - **Pushing a tree down with heavy machinery instead of felling the tree with a chainsaw**
 - **First pushing the tree lightly 2 to 3 times with a pause of 30 seconds between each nudge to allow bats to become active, then pushing the tree to the ground slowly**
 - **Allowing the tree to remain in place for 24 to 48 hours until inspected by the qualified biologist for presence or absence of roosting bats**
- **The qualified biologist shall document all bat survey, monitoring, and protection measure activities and prepare a summary report for LACFCD.**

- 563 In the 2nd paragraph under BIOLOGY-2, the following clarifications have been made:
- This Alternative will impact the same amount of Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~ as the Proposed Project. Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~ are rare plant communities that provide nesting habitat for riparian species. Impacts to these habitats will result in a potentially significant impact. To minimize impacts due to the loss of Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~, Mitigation Measures MM BIO-7 and MM BIO-8 have been provided. With implementation of these mitigation measures, impacts to Riparian Woodland and **Mule Fat Thickets** ~~Mule Fat Scrub~~ will be reduced to a level below significance.
- 564 In the 3rd paragraph under Mitigation Measures, the following clarification has been made:
- MM BIO – 8:** A combination of onsite and offsite habitat restoration, enhancement, and exotic removal shall be implemented by LACFCD at a 1:1 ratio for impacted sensitive habitat and jurisdictional waters. Habitat restoration/enhancement shall include use of willow cuttings and exotic species removal. **Non-native, weedy Ruderals** habitats within the basin shall be utilized whenever possible as mitigation sites. This mitigation measure shall be monitored for success for five years following implementation. A report of the monitoring results shall be submitted annually, during the five years following implementation, to resource agencies as required by the Section 401 Certification, Section 404 permit, and a Streambed Alteration Agreement.
- 566 In the 1st paragraph under BIOLOGY-4, the following information has been added:
- The Proposed Project area is predominantly open for wildlife movement and habitat connectivity. **Sediment removal will not be continuous, as excavation is expected to occur only in the drier months (April to December, excluding holidays). In addition, sediment removal activities would not completely block the Proposed Project site from surrounding habitat, would occur only during the day, and would not interfere with nighttime wildlife activity. Although some wildlife may be temporarily displaced during construction, wildlife would not be physically prevented from moving around and into the basin area.** Sediment removal and reservoir management activities associated with Alternative 5, Haul Route Alternative will interfere temporarily with the movement of native resident or migratory wildlife species, resulting in a potentially significant impact. Reduction in sensitive habitat would interfere with use of the habitat for wildlife nursery sites, resulting in a potentially significant impact. **To minimize impacts to less than significant, Mitigation Measures MM BIO-1 through MM BIO-8 has been provided.** This impact will be similar in comparison to the Proposed Project due to the similarities in area disturbed during sediment removal and reservoir management Option 1.
- 571 In the 1st paragraph under GHG EMISSIONS-1, the following information has been added:
- Alternative 5, Haul Route Alternative will use the same amount and type of construction equipment as the Proposed Project. **Use of sediment removal dump trucks that meet EPA's emission standards for Model Year 2007 or later and use of off-road equipment**

that meets, at a minimum, EPA's emission standards for Tier 3 equipment, would result in a reduction of GHG emissions. As noted in Section 3.6, generation of greenhouse gas emissions under the Proposed Project is not "cumulatively considerable" and is therefore less than significant under CEQA. Alternative 5, Haul Route Alternative will have the same amount of daily equipment usage and truck traffic; therefore, this alternative will generate the same greenhouse gas emissions as the Proposed Project, which will not be "cumulatively considerable," and is therefore less than significant under CEQA.

586 In the 4th paragraph under Recreation and Public Services, following detail has been added:

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, **MACH 1**, or Tom Sawyer Camp.

590 In the 1st and 2nd paragraphs under TRANSPORTATION-1, the following clarifications have been made:

Truck traffic associated with the Alternative 5, Haul Route Alternative is expected to adhere to traffic regulations; however, during sediment removal, truck traffic is expected to impact traffic LOS on the existing roadway network. Potential impacts regarding existing LOS are discussed under TRANSPORTATION-2 below. This increase in traffic would result in **temporary** significant impacts to the efficiency of the circulation system. Implementation of Mitigation Measures MM TRA-1 and TRA-2 would reduce this impact but not to a level of less than significant.

Sediment removal and associated transportation under this Alternative could potentially have the same duration as the Proposed Project. Other potential impact reduction measures discussed under TRANSPORTATION-2, below, could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this **temporary** impact could remain potentially significant.

590 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce impacts to traffic and circulation but not to a level of less than significant. Other potential impact reduction measures discussed under TRANSPORTATION-2, below, could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, this **temporary** impact could remain potentially significant. **No significant traffic impacts would occur under reservoir management.**

591 Table 4.8-2 has been revised as follows:

Table 4.8-1: Alternative Haul Route Streets

Alternative Haul Routes	Streets To Be Used
To/From Devil's Gate Reservoir to eastern disposal sites, Option 1	<ul style="list-style-type: none"> ▪ Exit WB I-210 at Windsor Avenue/Arroyo Boulevard ▪ Turn right onto EB Windsor Avenue and then left onto NB Oak Grove Drive ▪ Enter and exit the project site on Oak Grove Drive ▪ Turn left onto SB Oak Grove Drive and then right onto WB Windsor Avenue ▪ Enter EB I-210 at Windsor Avenue/Arroyo Boulevard
To/From Devil's Gate Reservoir to eastern disposal sites, Option 2	<ul style="list-style-type: none"> ▪ <i>Exit WB I-210 at Berkshire Place</i> ▪ <i>Turn right onto EB Berkshire Place and then right onto SB Oak Grove Drive</i> ▪ <i>Enter and exit the project site on Oak Grove Drive</i> ▪ <i>Turn right onto NB Oak Grove Drive and then left onto WB Berkshire Place</i> ▪ <i>Enter EB I-210 at Berkshire Place</i>
To/From Devil's Gate Reservoir Area to western disposal sites, Option 1	<ul style="list-style-type: none"> ▪ Exit EB I-210 at Windsor Avenue/Arroyo Boulevard ▪ Turn right onto EB Windsor Avenue and then left onto NB Oak Grove Drive ▪ Enter and exit the project site on Oak Grove Drive ▪ Turn left onto SB Oak Grove Drive and then right onto WB Windsor Avenue ▪ Enter WB I-210 at Windsor Avenue/Arroyo Boulevard
To/From Devil's Gate Reservoir Area to western disposal sites, Option 2	<ul style="list-style-type: none"> ▪ <i>Exit EB I-210 at Berkshire Place</i> ▪ <i>Turn left onto EB Berkshire Place and then right onto SB Oak Grove Drive</i> ▪ <i>Enter and exit the project site on Oak Grove Drive</i> ▪ <i>Turn right onto NB Oak Grove Drive and then left onto WB Berkshire Place</i> ▪ <i>Enter WB I-210 at Berkshire Place</i>
To/From Manning Pit	<ul style="list-style-type: none"> ▪ Exit EB I-210 at Irwindale Avenue ▪ Turn right onto SB Irwindale Avenue ▪ Turn left onto EB Gladstone Street and then right onto SB Vincent Avenue ▪ Enter and exit the disposal site on Vincent Avenue ▪ Turn left onto NB Vincent Avenue and then left onto NB Azusa Avenue ▪ Turn right onto EB First Street ▪ Enter WB I-210 at First Street
To/From Scholl Canyon Landfill	<ul style="list-style-type: none"> ▪ Exit EB SR-134 at Figueroa Street ▪ Turn right onto NB Figueroa Street ▪ Enter and exit the disposal site on Scholl Canyon Road ▪ Turn right onto SB Scholl Canyon Road ▪ Enter WB SR-134 at Figueroa Street

Table 4.8-1: Alternative Haul Route Streets

Alternative Haul Routes	Streets To Be Used
To/From Sheldon Pit	<ul style="list-style-type: none"> ▪ Exit WB I-210 at the Wheatland Avenue interchange ▪ Turn right onto NB Wheatland Avenue ▪ Turn right onto EB Foothill Boulevard ▪ Turn right onto WB Wentworth Street ▪ Enter and exit the disposal site on Sheldon Street ▪ Turn left onto EB Sheldon Street ▪ Turn left onto WB Foothill Boulevard ▪ Turn left onto SB Wheatland Avenue ▪ Enter EB I-210 at the left onto SB Wheatland Avenue interchange
To/From Sun Valley Fill Site	<ul style="list-style-type: none"> ▪ Exit WB I-210 at the Wheatland Avenue interchange ▪ Turn right onto NB Wheatland Avenue ▪ Turn right onto EB Foothill Boulevard ▪ Turn right onto WB Wentworth Street ▪ Enter the disposal site on Sheldon Street ▪ Exit the disposal site on Glenoaks Boulevard ▪ Turn right onto NB Glenoaks Boulevard ▪ Turn right onto EB Sheldon Street ▪ Turn left onto WB Foothill Boulevard ▪ Turn left onto SB Wheatland Avenue ▪ Enter EB I-210 at the left onto SB Wheatland Avenue interchange
To/From Bradley Landfill	<ul style="list-style-type: none"> ▪ Exit WB I-210 at the Wheatland Avenue interchange ▪ Turn right onto NB Wheatland Avenue ▪ Turn right onto EB Foothill Boulevard ▪ Turn right onto WB Wentworth Street ▪ Turn left onto SB Glenoaks Boulevard ▪ Turn right onto WB Peoria Street ▪ Enter and exit the disposal site on Peoria Street ▪ Turn left onto EB Peoria Street ▪ Turn left onto NB Glenoaks Boulevard ▪ Turn right onto EB Sheldon Street ▪ Turn left onto WB Foothill Boulevard ▪ Turn left onto SB Wheatland Avenue ▪ Enter EB I-210 at the left onto SB Wheatland Avenue interchange
To/From Boulevard Pit	<ul style="list-style-type: none"> ▪ Exit the SB I-5 at Osborne Street ▪ Turn left onto EB Osborne Street ▪ Turn right onto SB Laurel Canyon Boulevard ▪ Turn left onto EB Branford Street ▪ Enter and exit the disposal site on Branford Street ▪ Turn left onto WB Branford Street ▪ Turn right onto NB Laurel Canyon Boulevard ▪ Turn left onto WB Osborne Street ▪ Enter the NB I-5 at Osborne Street

593 In the 2nd through 4th paragraphs under TRANSPORTATION-2, the following revisions have been made:

Option 1 Haul Route

Table 4.8-3 shows the LOS for Proposed Project traffic at year 2014 for the intersections between the reservoir and I-210 **Option 1 haul route** toward the eastern disposal sites.

Table 4.8-4: Alternative Haul Route to I-210 to Eastern Disposal Sites, **Option 1** AM Peak Hour shows the contribution of Proposed Project traffic to existing conditions and year 2014 conditions for the AM peak period. All the intersections **between the reservoir and I-210 toward the eastern disposal sites using the Option 1 haul route** are anticipated to continue to operate at LOS C or better for all utilized intersections throughout the day.

Use of this alternative route would require implementation of the following potential impact reduction measure:

- The median on Oak Grove Drive would be restriped to a Two Way Left Turn Lane (TWLTL). Trucks exiting the Devil's Gate Reservoir driveway will cross the two lanes of oncoming westbound traffic on Oak Grove Drive and utilize the TWLTL if necessary to merge into the eastbound traffic. The changes to Oak Grove Drive would require the approval of the City of Pasadena.

The **addition of the TWLTL for the** impact reduction measure discussed above cannot be legally imposed by the LACFCD since the location is under the jurisdiction of the City of Pasadena. Every reasonable effort will be made to coordinate with and receive approval to implement this impact reduction measure; however, LACFCD cannot guarantee that this impact reduction measure will be implemented and cannot guarantee that these alternative haul routes can be used.

594 The following table names were revised:

Table 4.8-3: Alternative Haul Route to I-210 to Eastern Disposal Sites, **Option 1**

Table 4.8-4: Alternative Haul Route to I-210 to Eastern Disposal Sites AM Peak Hour, **Option 1**

595 After Table 4.8-4, the following information has been added:

Option 2 Haul Route

Table 4.8-5 shows the LOS for Proposed Project traffic at year 2014 for the intersections between the reservoir and I-210 Option 2 haul route toward the eastern disposal sites.

Table 4.8-6: Alternative Haul Route to I-210 to Eastern Disposal Sites, Option 2 AM Peak Hour shows the contribution of Proposed Project traffic to existing conditions and year 2014 conditions for the AM peak period.

All the intersections between the reservoir and I-210 toward the eastern disposal sites using Berkshire Place are anticipated to continue to operate at an LOS C or better for all utilized intersections during the MID-DAY and PM peak periods. Therefore, no significant impacts will occur at these intersections during the MID-DAY and PM peak periods. The Berkshire Place and I-210 eastbound ramps intersection is anticipated to operate at an unacceptable LOS during the AM peak hour, resulting in a temporary significant impact.

Use of this alternative route would require implementation of the following potential impact reduction measure:

The median on Oak Grove Drive would be restriped to a Two Way Left Turn Lane (TWLTL). Trucks traveling eastbound on Oak Grove Drive and entering the Devil's Gate Reservoir east side driveway will utilize the TWLTL if necessary to turn left. The changes to Oak Grove Drive would require the approval of the City of Pasadena.

The addition of the TWLTL for the impact reduction measure discussed above cannot be legally imposed by the LACFCD since the location is under the jurisdiction of the City of Pasadena. Every reasonable effort will be made to coordinate with and receive approval to implement this impact reduction measure; however, LACFCD cannot guarantee that this impact reduction measure will be implemented and cannot guarantee that these alternative haul routes can be used.

596 The following tables have been added:

Table 4.8-5: Alternative Haul Route to I-210 to Eastern Disposal Sites, Option 2

Intersection #/Name	AM				MID-DAY (12-2 PM)				MID-DAY (2-4 PM)				PM			
	HCM LOS	HCM Delay	HCM V/C	ICU LOS	HCM LOS	HCM Delay	HCM V/C	ICU LOS	HCM LOS	HCM Delay	HCM V/C	ICU LOS	HCM LOS	HCM Delay	HCM V/C	ICU LOS
1 Berkshire Place and I-210 eastbound ramps	F	51.4	-	-	B	10.8	-	-	C	23.7	-	-	D	31.6	-	-
2 Berkshire Place and I-210 westbound ramps	B	13.1	-	-	A	7.0	-	-	A	9.3	-	-	A	5.6	-	-
3 Oak Grove Drive and Berkshire Place	C	26.6	0.97	B	A	6.2	0.30	A	A	7.1	0.49	A	A	8.4	0.57	B

Table 4.8-6: Alternative Haul Route to I-210 to Eastern Disposal Sites AM Peak Hour, Option 2

AM Peak Hour		Existing Conditions		Existing Plus Project Conditions		Difference with vs. without project	Year 2014 with Project		Year 2014 with Project and Mitigation		Potentially Significant Impact
		HCM V/C	HCM LOS	HCM V/C	HCM LOS		HCM V/C	HCM LOS	HCM V/C	HCM LOS	
1	Berkshire Place and I-210 eastbound ramps	-	D	-	E	YES	-	F	N/A*	N/A*	YES
2	Berkshire Place and I-210 westbound ramps	-	A	-	A	NO	-	B	NMR**	NMR**	NO
3	Oak Grove Drive and Berkshire Place	0.50	A	0.67	A	NO	0.97	C	NMR**	NMR**	NO

* No mitigation available.
**No mitigation required.

597 In the 1st paragraph on the page, the following revisions have been made:

Option 1 Haul Route

Table 4.8-7 shows the contribution of Proposed Project traffic to existing conditions and year 2014 conditions for the AM peak period. All the intersections **between the reservoir and I-210 toward the eastern disposal sites using the Option 1 haul route** are anticipated to continue to operate at LOS **D** or better for all utilized intersections throughout the day. Therefore, no significant impacts will occur at these intersections.

597 The following table name has been revised:

Table 4.8-7: Alternative Haul Route to I-210 to Western Disposal Sites, Option 1

597 The following table name has been revised:

Table 4.8-8: Alternative Haul Route to I-210 to Western Disposal Sites AM Peak Hour, Option 1

598 In the 1st paragraph after Table 4.8-8, the following information has been added:

Option 2 Haul Route

Table 4.8-9 shows the LOS for Proposed Project traffic at year 2014 for the intersections between the reservoir and I-210 Option 2 haul route toward the western disposal sites.

Table 4.8-10: Alternative Haul Route to I-210 to Western Disposal Sites, Option 2 AM Peak Hour shows the contribution of Proposed Project traffic to existing conditions and year 2014 conditions for the AM peak period.

All the intersections between the reservoir and I-210 toward the western disposal sites using Berkshire Place are anticipated to continue to operate at an LOS C or better for all utilized intersections during the MID-DAY and PM peak periods. Therefore, no significant impacts will occur at these intersections during the MID-DAY and PM peak periods. The Berkshire Place and I-210 eastbound ramps intersection is anticipated to operate at an unacceptable LOS during the AM peak hour, resulting in a temporary significant impact.

Use of this alternative route would require implementation of the following potential impact reduction measure:

- *The median on Oak Grove Drive would be restriped to a Two Way Left Turn Lane (TWLTL). Trucks traveling eastbound on Oak Grove Drive and entering the Devil's Gate Reservoir east side driveway will utilize the TWLTL if necessary to turn left. The changes to Oak Grove Drive would require the approval of the City of Pasadena.*

The addition of the TWLTL for the impact reduction measure discussed above cannot be legally imposed by the LACFCD since the location is under the jurisdiction of the City of Pasadena. Every reasonable effort will be made to coordinate with and receive approval to implement this impact reduction measure; however, LACFCD cannot guarantee that this impact reduction measure will be implemented and cannot guarantee that these alternative haul routes can be used.

598 The following tables have been added:

Table 4.8-9: Alternative Haul Route to I-210 to Western Disposal Sites, Option 2

Intersection #/Name	AM				MID-DAY (12-2 PM)				MID-DAY (2-4 PM)				PM						
	LOS	HCM	Delay	HCM	V/C	HCM	Delay	HCM	V/C	LOS	HCM	Delay	HCM	V/C	LOS	HCM	Delay	HCM	V/C
2 Berkshire Place and I-210 westbound ramps	B		11.0	-	-	A	4.7	-	-	A	6.9	-	-	A	3.7	-	-		
1 Berkshire Place and I-210 eastbound ramps	E		48.2	-	-	B	10.6	-	-	C	18.9	-	-	C	21.8	-	-		
3 Oak Grove Drive and Berkshire Place	C		26.6	0.97	B	A	6.2	0.30	A	A	7.1	0.49	A	A	8.4	0.57		B	

Table 4.8-10: Alternative Haul Route to I-210 to Western Disposal Sites AM Peak Hour, Option 2

AM Peak Hour		Existing Conditions		Existing Plus Project Conditions		Difference with vs. without project	Year 2014 with Project		Year 2014 with Project and Mitigation		Potentially Significant Impact
		HCM V/C	HCM LOS	HCM V/C	HCM LOS		HCM V/C	HCM LOS	HCM V/C	HCM LOS	
2	Berkshire Place and I-210 westbound ramps	-	A	-	A	NO-	-	B	NMR**	NMR**	NO
1	Berkshire Place and I-210 eastbound ramps	-	A	-	E	YES	-	E	NMR*	NMR*	YES
3	Oak Grove Drive and Berkshire Place	0.50	A	0.67	A	NO	0.97	c	NMR**	NMR**	NO

* No mitigation available.

**No mitigation required.

599 In the 1st paragraph under Manning Pit Area to/from I-210, the following clarifications have been made:

Table 4.8-11 shows the LOS for Proposed Project traffic at year 2014 for the intersections between Manning Pit and I-210. Table 4.8-12, Table 4.8-13, and Table 4.8-14 show the contribution of Proposed Project traffic to existing conditions and year 2014 conditions for the AM, Mid-Day, and PM peak periods respectively. The Arrow Highway/Lark Ellen Avenue intersection is anticipated to operate at an unacceptable LOS during the AM, Mid-Day, and PM peak periods, resulting in a **temporary** significant impact. The Arrow Highway/Enid Avenue intersection, Azusa Avenue/Arrow Highway, Azusa Avenue/Gladstone Street, and First Street and Alameda Street/I-210 Westbound Ramps are anticipated to operate at an unacceptable LOS during the AM peak hour, resulting in a **temporary** significant impact. The Arrow Highway/Enid Avenue intersection is anticipated to operate at an unacceptable LOS during the Mid-Day peak hour, resulting in a **temporary** significant impact. The Arrow Highway/Enid Avenue intersection and Azusa Avenue/Arrow Highway are anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in a **temporary** significant impact.

604 In the 1st paragraph under Vulcan Materials Reliance Facility to/from I-210, the following clarification has been made:

The route to the Vulcan Material Reliance Facility would be the same as for the Proposed Project. All the intersections are anticipated to continue to operate at an LOS D or better for all utilized intersections during the AM and MID-Day peak periods. Therefore, no significant impacts will occur at these intersections during these time periods. The Irwindale Avenue/Foothill Boulevard intersection is anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in a **temporary** significant impact. Implementation of Mitigation Measure MM TRA-1 would reduce the impact to the Irwindale Avenue/Foothill Boulevard intersection to less than significant.

604 In the 2nd paragraph under Scholl Canyon Landfill to/from SR-134, the following clarification has been made:

The Figueroa St/Scholl Canyon Road and SR-134 westbound ramps intersection is anticipated to operate at an unacceptable LOS during the AM and PM peak hours, resulting in a **temporary** significant impact. Reducing this impact to less than significant would require implementation of the following potential impact reduction measure:

604 In the 4th paragraph under Scholl Canyon Landfill to/from SR-134, the following clarification has been made:

This impact reduction measure cannot be legally imposed by the LACFCD. Every reasonable effort will be made to coordinate with and receive approval to implement the impact reduction measure; however, LACFCD cannot guarantee that the measure will be implemented therefore this **temporary** impact could remain significant.

609 In the 2nd paragraph under Boulevard Pit Area to/from I-5, the following clarification has been made:

Table 4.8-25 shows the contribution of Proposed Project traffic to existing conditions and year 2014 conditions for the PM peak period respectively. The Osborne Street /Laurel Canyon Boulevard is anticipated to operate at an unacceptable LOS during the PM peak hour, resulting in a **temporary** significant impact. Mitigation Measure MM TRA-2 would reduce the impacts to less than significant.

611 In the 1st paragraph on the page, the following edits were made:

As with the Proposed Project, Alternative 5, Haul Route Alternative will **temporarily** significantly impact the following intersections:

- **Berkshire Place and I-210 eastbound ramps during the AM peak hour (Option 2); and**
- Figueroa Street/Scholl Canyon Road and SR-134 westbound ramps during the AM and PM peak hours

611 In the 3rd paragraph on the page, the following clarification has been made:

In contrast to the Proposed Project, Alternative 5, Haul Route Alternative will **temporarily** significantly impact the following intersections:

- Arrow Highway/Lark Ellen Avenue during the AM, Mid-Day, and PM peak periods;
- Arrow Highway/Enid Avenue intersection during the AM, Mid-Day, and PM peak hours;
- Azusa Avenue/Arrow Highway during the AM and PM peak hours; and
- First Street and Alameda Street/I-210 Westbound Ramps during the AM peak hour.

611 In the 4th paragraph on the page, the following information was added:

In contrast to the Proposed Project, Alternative 5, Haul Route Alternative will not significantly impact:

- Berkshire Place and I-210 eastbound ramps during the AM peak hour (**with exception of Option 2**); and
- Glenoaks Boulevard/Osborne Street intersection during the AM and PM peak hours.

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these **temporary** impacts could remain potentially significant. **No significant traffic impacts would occur under reservoir management.**

611 In the 1st paragraph under Comparison to Proposed Project and Other Alternatives, the following revisions were made:

Overall, Alternative 5, Haul Route Alternative is considered environmentally superior to the Proposed Project due to alternate haul route and reduction in traffic impacts associated with the route. Alternative 5, Haul Route Alternative is considered environmentally superior to the Proposed Project for the following segments: Devil's Gate Reservoir to I-210 (**with exception of Option 2**); To/From Sheldon Pit; To/From Sun Valley Fill Site; and To/From Bradley Landfill. Alternative 5, Haul Route Alternative is considered neither environmentally superior nor inferior to the Proposed Project for the following segments: **Devil's Gate Reservoir to I-210 (Option 2 only)**; To/From Waste Management Facility, To/From Vulcan Materials Reliance Facility, To/From Boulevard Pit, and To/From Scholl Canyon. Alternative 5, Haul Route Alternative is considered environmentally inferior to the Proposed Project for the following segment: To/From Manning Pit.

612 In the 1st and 2nd paragraphs under TRANSPORTATION-3, the following clarifications have been made:

Implementation of the Alternative 5, Haul Route Alternative may include impact reduction measures that would require modifications to the existing roadway network. Alternative 5, Haul Route Alternative would not introduce any new uses that would be incompatible **or substantially increase hazards** with the existing roadway system. Therefore, impacts related to traffic hazards would be less than significant.

Reservoir Management

The reservoir management associated with Alternative 5, Haul Route Alternative would not require any modifications to the existing roadway network and would not introduce any new uses that would be incompatible **or substantially increase hazards** with the existing roadway system. Therefore, no impact would occur.

- 613 In the 1st paragraph under TRANSPORTATION-5, the following clarification has been added:

Alternative 5, Haul Route Alternative would be confined to the roadway network described in Section 4.8.1, above, and would not adversely affect alternative modes of public transportation such as light rail. Implementation of Alternative 5, Haul Route Alternative would not require closure of any bus stops or disrupt any existing bus routes. The degrading of LOS at intersections, freeway segments, and freeway on- and off-ramps described above under TRANSPORTATION-2 could affect buses using the existing roadway network. This would be a **temporary** potentially significant impact.

- 614 In the 1st paragraph under Residual Impacts After Mitigation, the following clarifications have been made:

Potentially significant traffic impacts associated with the sediment removal phase would be temporary, expected to occur during the drier months (from April to December, except on holidays), and would cease at the end of the sediment removal phase. Implementation of the mitigation measures described above would reduce some but not all of the impacts to traffic and circulation to a level less than significant. Other potential impact reduction measures discussed above could reduce impacts to less than significant. These measures cannot be legally imposed by the LACFCD, however, since the locations are under the jurisdiction of other agencies. Every reasonable effort will 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 will be implemented. Therefore, these **temporary** impacts could remain potentially significant. ***No significant traffic impacts would occur under reservoir management.***

- 615 In the 3rd paragraph under UTILITIES-1, the following clarification has been made:

During reservoir management, Alternative 5, Haul Route Alternative will not result in or require the construction of new or expansion of existing stormwater drainage systems. Sediment that accumulates at the front of the reservoir after the proposed removal will be removed through FAST operations or through mechanical excavation, and sediment accumulated at the back basin will be removed through trucking. The FAST operations are expected to be similar to historic FAST operations, and sediment fines discharged through FAST operations will be transported during storm flows to the Pacific Ocean via Arroyo Seco and the Los Angeles River. No impacts to stormwater facilities are expected during FAST operations. Any necessary mechanical removal during reservoir management is expected to be small (**typically** 13,000 cy per year). Impacts to stormwater facilities during mechanical removal will be avoided through compliance

with City regulations regarding stormwater facilities and implementation of LACDPW BMPs.

Section 4.9 Alternative 6, No Project Alternative

Page Clarification/Revision

624 In the 2nd paragraph under BIOLOGY-2, the following clarifications have been made:

This alternative will directly impact less Riparian Woodland and ~~Mule Fat Scrub~~ **Mule Fat Thickets** than the Proposed Project. Riparian Woodland and ~~Mule Fat Scrub~~ **Mule Fat Thickets** are rare plant communities that provide nesting habitat for riparian species; however, habitat loss or reduction in habitat quality will result from the accumulation of sediment or scouring throughout the reservoir. Impacts will be potentially significant.

643 In the 4th paragraph under Recreation and Public Services, following detail has been added:

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, **MACH 1**, or Tom Sawyer Camp.

646 In the 1st and 2nd paragraphs under TRANSPORTATION-3, the following clarifications have been made:

Implementation of the Alternative 6, No Project Alternative would not require mitigation measures that would require modifications to the existing roadway network. Alternative 6, No Project Alternative would not require any trucking and would not introduce any new uses that would be incompatible **or substantially increase hazards** with the existing roadway system. Therefore, impacts related to traffic hazards would be less than significant.

Reservoir Management

The reservoir management associated with Alternative 6, No Project Alternative would not require any modifications to the existing roadway network and would not introduce any new uses that would be incompatible **or substantially increase hazards** with the existing roadway system. Therefore, no impact would occur.

Section 5.1 Environmental Effects Found Not To Be Significant

Page Clarification/Revision

652 In the 3rd paragraph, the following clarifications have been made:

After a more detailed evaluation of the environmental issues associated with the Proposed Project, the EIR determined that impacts would be less than significant or less

than significant with incorporation of mitigation measures for the following environmental issue areas:

- **Air Quality**

Section 5.4 Significant Unavoidable Environmental Impact

Page Clarification/Revision

653 In the 1st paragraph, the following clarifications have been made:

The potentially adverse effects of the Proposed Project are discussed in Chapter 3.0 of this EIR. Mitigation Measures have been recommended that would reduce impacts for all categories except aesthetics, ~~air quality~~, and traffic to less than significant based on each set of significance criteria. The Proposed Project would result in significant unavoidable impacts related to aesthetics, ~~air quality~~, and **temporary significant unavoidable impacts related to** traffic.