



City Council
Leonard Pieroni, Mayor
Gregory C. Brown, Mayor Pro Tem
Jonathan C. Curtis
Michael T. Davitt
Terry Walker

April 25, 2019

The Honorable Kathryn Barger, L.A. County Supervisor
Hall of Administration
500 W. Temple Street, Room 869
Los Angeles, CA 90012

RE: Devil's Gate Dam Sediment Removal Project

Dear Supervisor Barger:

As you are aware, the City Council of the City of La Cañada Flintridge has long shared in the concerns of our residents and La Cañada Unified School District ("School District") regarding the potential impacts on residents (air emissions and traffic congestion) that are likely to emanate from the Devil's Gate Dam Sediment Removal Project (the "Project"). Particularly, we are very concerned with the possible health effects on the adjacent school-age children from the potentially unhealthy air emissions coming from the frequent vehicles hauling sediment removed from the Project.

We would like to thank you and the Los Angeles County Department of Public Works (DPW) for your efforts in support of protecting the health and safety of the public. We are grateful for your hosting the joint meeting with parents and School District to more fully discuss the concerns raised by the community. We thank you for your support in establishing practices that promote adherence to current regulatory requirements intended to minimize the hazards posed by diesel truck emissions. We also appreciate your commitment to involving a third-party air quality consultant to assist in monitoring the air quality impacts from the construction activities.

While the City Council supports the removal of the debris at the Devil's Gate Dam to ensure the public's protection from potential flooding, concerns persist about the potential exposure to harmful diesel pollutants and fugitive dust that will likely be experienced by our students, staff and residents as the Project is carried out. We are prompted to ask how the County plans to ensure that the public's health and safety will be immediately protected should an event trigger unhealthy indications?

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Immediate Action Plan / [Focused] Community Safety Plan. To this end, the City is requesting your consideration of: (1) development of an Immediate Action Plan ("IAP") for the near-term; and (2) development of a focused Community Safety Plan ("CSP") for the long-term, with a particular emphasis on air emissions and traffic circulation. The development of an IAP (and its successor CSP) will inform of appropriate action that the County will take in the event that an immediate response to an event or trigger is warranted. The City anticipates that such an IAP/CSP would outline how data that is collected for the Project, as interpreted by CARB/SCAQMD and published online, can inform of appropriate action and provide a transparent mechanism for changes that ensure the safety for all impacted members of the community. The IAP/CSP would provide a method for measuring potential health hazards caused by poor air quality, fugitive dust, and traffic congestion in the event that identified thresholds are exceeded. Acceptable thresholds would be identified in each area and tied to specific actions. Sample language for particulate matter (PM₁₀) is provided below:

"ACTION PLAN TO REDUCE AIRBORNE CONCENTRATIONS OF PM₁₀: If an action level in the work area (construction) or in the perimeter area (specific school campus) is exceeded, project activities will immediately cease until management practices are adjusted to reduce airborne concentrations of PM₁₀ to below the action limits. Best Management Practices (BMPs), such as additional water trucks and ceasing excavation and loading during high winds, will be employed to prevent exposure to the sensitive receptors and public. If management controls fail to reduce airborne concentrations to below the above identified action limits, project activities will cease and the on-site project manager will be notified to discuss options for additional controls that may be needed to reduce concentration levels."

In the above example, if the third-party air quality consultant reports that the level of harmful pollutants has exceeded adopted thresholds, even if due to combined Project contributions and ambient contributions from the I-210 Freeway, then the DPW would adjust its construction activities (both off-road and on-road) in response. Alternatively, if there is a noted increase in respiratory complaints/problems reported by students at Project adjacent schools, then monitoring devices would be deployed to investigate the sources of the complaints.

While the IAP is intended for the initial commencement of the Project and may be more cursory, we respectfully request that the DPW create a detailed yet focused CSP for the longer-term Project that outlines the decision-making process for adjusting Project activities in the event that BMPs and truck compliance measures do not sufficiently mitigate the health hazards generated by the Project.

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Precedent for a CSP. There already exists precedent for the development of a CSP. Recently, the Los Angeles County Department of Public Health (DPH) conducted investigations in response to resident complaints of adverse health symptoms that appeared to be related to work performed at industrial facilities located adjacent to densely populated neighborhoods in other communities. Even though the activities were previously approved, the recurring observation was that either mitigation measures were inadequate or there was insufficient regulatory oversight. Based on lessons learned, the DPH published a recommendation that operations involving pollutants that can contaminate the local airshed should “prepare and make available to the public a comprehensive Community Safety Plan.” Excerpts from the published report state:

“Community Safety Plan Operators should prepare and make available to the public, a comprehensive Community Safety Plan, in coordination with City and County departments, including Fire, Building & Safety, and law enforcement. These plans should include information...on air emission monitoring efforts; and health-based exposure thresholds, to identify the need for additional mitigation.”

“The Community Safety Plan should facilitate communication and input from local stakeholders, and be submitted to DPH for review and approval. The plan should include protocols and procedures for immediate notification to the County Health Officer in the event of odor or health complaints.”

Website/Complaint Portal. In addition, in collaboration, the City and School District jointly request that the County maintain a dedicated Project website throughout the Project’s duration and incorporate a complaint portal or link whereby affected residents may express or share their concerns, complaints or issues with the conduct of the Project. It is hoped that the complaints or information obtained through this portal will be shared with the local agencies daily (at least, initially) so that we may evaluate the County’s response and/or provide support services to address the citizens’ concerns.

We are hopeful that the County’s prior experiences will inspire a framework that addresses all of the health and safety concerns of the La Cañada Flintridge community. We look forward to working together to achieve this aim.

Sincerely,



Len Pieroni

Mayor

cc: Mr. Mark Pestrella, P.E., Los Angeles County Department of Public Works
The Honorable Anthony Portantino, California State Senator
La Cañada Flintridge City Council & City Manager
Governing Board, La Cañada Unified School District & Superintendent
Dr. Elizabeth Krider, on behalf of the La Cañada Parents’ Group