

# Coalition for the Protection of the Arroyo Seco

September 16, 2002

City of Pasadena  
Planning and Permitting Department  
175 North Garfield Avenue  
Pasadena, CA 91109-7215

**Attention: Mr. Joshua Hart, Associate Planner**

**Regarding: Comments on the Arroyo Seco Master Plan and  
Draft Master Plan Environmental Impact Report (Document attached)**

Dear Mr. Hart:

The Coalition for the Protection of the Arroyo Seco (CPAS) herewith submits the referenced document subtitled "Keep it Natural".

Thank you for providing an extended opportunity to review and comment upon the Arroyo Seco Master Plan (ASMP) and Draft Master Plan Environmental Impact Report (MEIR) which was released by the City of Pasadena on May 16, 2002.

Following your release of the ASMP and MEIR, local citizens recognized that staff and consultants preparing these documents failed to understand and incorporate the vision for the Arroyo Seco as stated in the Lower Arroyo Seco Master Plan (LAMP)<sup>1</sup> into the other elements or the ASMP itself.

Due to mounting concern, a group of citizens representing many neighborhood associations and community and environmental organizations pooled their resources, with the objective of seeking the restoration, preservation and protection of the Arroyo Seco for future generations. And so, CPAS was born.

We have several crucial requests plus a recommendation outlined below.

## **CPAS asks that the City Council:**

- **Not certify the MEIR** dated May 16, 2002 because it is legally inadequate and based on a deficient master plan (ASMP);
- **Not adopt the current ASMP** since it does not reflect the desires of citizens nor correspond to the General Plan and Guiding Principles of the City of Pasadena;
- **Direct City Staff to re-write the ASMP** to include the following objectives:
  - Write it in a manner that makes it readable and understandable;
  - Present each of the elements of the ASMP identically organized and consistently prepared in order to improve clarity; and
  - Prepare all elements in conformance with CEQA guidelines.

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<sup>1</sup> LAMP Section 4 (please refer to Appendix B for LAMP Introductory Comments)

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**CPAS asks that the City Staff:**

- Emphasize habitat enhancement, restoration and preservation, using appropriate native plant materials at all times as set out in the introductory remarks in the LAMP;
- Focus on preserving the Arroyo Seco's historic character and environment;
- Limit the objective in MEIR Section 2.1, "*Update the Arroyo Seco Public Lands Ordinance*", to incorporating the Hahamongna Watershed Park into the Arroyo Seco Public Lands Ordinance;
- Focus on the third objective in MEIR Section 2.1: "*Achieve restoration/conservation of the natural environment*". This should also include restoration and preservation of open space and ongoing maintenance of the Arroyo; and
- **Not** include as a goal of the ASMP: "To provide **new** revenue generating park facilities".
- Set policy to guide preservation, conservation and recreation activities in the Arroyo.

**CPAS Recommends:**

- That all projects proposed for deferred maintenance and improved safety be completed as quickly as possible. This applies especially to the Central Arroyo, since projects developed by joint efforts of city and stakeholders of the Central Arroyo were reflected in the CAMP. ***These projects are valuable, high-priority items wholeheartedly endorsed by the public.***

**Open and natural spaces, once lost, cannot be reclaimed**

To help one appreciate what the Arroyo means to local citizens, we call attention to the fact that other levels of government and surrounding communities are devoting effort and tax dollars to acquire and preserve for themselves the natural riches that Pasadena and its neighbors to the East and Northwest already have. Regional governments such as the Santa Monica Mountains Conservancy and the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy<sup>2</sup> were created by the California Legislature to preserve the open and natural areas around us. Pasadena's neighbors, Altadena, La Cañada/Flintridge, Sierra Madre, Monrovia, Azusa and Duarte are aggressively acquiring and protecting foothill open space and riparian habitat through the actions of locally-created land and wildlife conservancies.

**The City of Pasadena must set the correct policy as a guide for protecting the Arroyo.**

Throughout history, every City action regarding the Arroyo tilts toward preserving its natural areas away from excavation, paving roads or trails, or creating parking lots in its domain.

By advocating extensive new infrastructure in Hahamongna and the Lower Arroyo, the ASMP violates what has always been the essential spirit of Pasadena's care for the Arroyo, prescribed in General Plan Policy 9.5, which is that ***Pasadena must be a steward of this rich natural area.***

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<sup>2</sup> Often referred to by its nickname, "The Rivers and Mountains Conservancy"

Stewardship is a very straightforward concept. *Stewardship means developing and implementing major programs for the protection, rehabilitation, restoration, and enhancement of the basic natural systems and outstanding scenic features of the area.*

The ASMP falls far short of providing a plan of stewardship. Rather than providing stewardship, the ASMP emphasizes development, maintenance and alteration of facilities and physical installations whose purposes are not the protection of the Arroyo's natural scenic resources.

The ASMP fails to incorporate public preferences as repeatedly expressed in numerous public meetings during the past decade. It also fails to follow key elements of the city's General Plan, and the requirements and prohibitions of the Arroyo Seco Ordinance. It constitutes a radical departure from the City's historic respect for and protection of the Arroyo Seco.

CPAS acknowledges the time and expense that have been incurred in the preparation of the ASMP and MEIR, but the ASMP fails to focus on the clear public preference for preserving, protecting and maintaining the City's most important natural treasure. The ASMP must be redone to achieve a viable plan for stewardship of the Arroyo Seco.

Best regards,

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(626) 796-4057

**On Behalf of  
Coalition for the Protection of the Arroyo Seco**

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**Comments On  
The Arroyo Seco Master Plan  
& Draft Master Plan EIR**

***Keep  
the Arroyo  
Natural***

**Prepared by**

**The Coalition for the Protection of the  
Arroyo Seco ("CPAS")**

c/o: Joan Hearst  
570 South Arroyo Boulevard  
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(626) 796-4057

**Monday, September 16, 2002**

**The following associations & organizations support and join in these comments (letters in Appendix A available as of noon, September 16, 2002, more to be submitted):**

Arroyo Seco Foundation, East Arroyo Residents Association, Florecita Farm Association of Neighbors, La Cañada/Flintridge Trails Council, Linda Vista/Annandale Association, Pasadena Audubon Society, Pasadena Heritage, Pasadena Group-Sierra Club, Putney Area Neighbors, Singer Park Neighborhood Association, West Pasadena Residents' Association. Letters from individuals (also on hand) are included in Appendix A.

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# **Coalition for the Protection of the Arroyo Seco (“CPAS”) Comments to Arroyo Seco Master Plan (“ASMP”) & Draft Master Plan Environmental Impact Report (“MEIR”)**

## **I. Introduction**

On May 16, 2002, the City of Pasadena (“City”) circulated a Draft Master Environmental Impact Report (“MEIR”) for the City’s Arroyo Seco Master Plan (“ASMP”). Pursuant to the California Environmental Quality Act of 1970 (“CEQA”) and applicable State and City CEQA Guidelines, the public is invited to comment in writing on the information contained in the MEIR. The City must respond to all written public comments prior to ruling on the adequacy of the MEIR and prior to taking action on the ASMP.

The ASMP area includes three sub-areas known as Hahamongna Watershed Park (“HWP”) (approximately 300 acres), the Central Arroyo Seco (approximately 550 acres), and the Lower Arroyo Seco (approximately 150 acres). The MEIR consists of the Hahamongna Watershed Park Master Plan (“HWP MP”), Central Arroyo Master Plan (“CAMP”), Lower Arroyo Master Plan (“LAMP”), Rose Bowl Use Plan and Design Guidelines and technical appendices.

### **Neighborhood Associations & Community Organizations Collaborate to form CPAS**

The Coalition for the Protection of the Arroyo Seco (“CPAS”) is a group of Pasadena, La Cañada and Altadena residents representing neighborhood associations, environmental organizations and other community stakeholders. Representatives of these organizations met regularly and joined with many other citizens to help preserve and protect the Arroyo Seco for future generations. We collectively represent thousands of local citizens, as demonstrated by the accompanying letters included with the list of supporting associations and organizations in Appendix A. The group is gravely concerned about the course that the City’s environmental review has taken. The analysis below highlights only a few of the numerous problems with the documents.

### **CPAS Recognizes the Importance of Protecting the Arroyo**

CPAS views the entire Arroyo Seco as the City’s greatest natural treasure and feels that *“the projects described in the ASMP emphasize infrastructure development, such as cutting new roads into the terrain, paving existing foot trails and leveling natural topography over habitat and streambed restoration and the rebuilding of historical trails and walkways”*<sup>3</sup>. Furthermore, Sage Council Executive Director, Leona Klippstein’s statement in the same article that *“going ahead with infrastructure improvements would be*

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<sup>3</sup> Judy Seckler, August 29, 2002, *City Beat: The River Wild – City at Odds With Resident Groups Over Plans to Develop Portions of the Arroyo Seco into Recreation Areas*, [Pasadena Weekly](#).

*a violation of CEQA, The Clean Water Act, The Endangered Species Act, the National Environmental Policy Act (“NEPA”) and the Migratory Bird Treaty Act*<sup>4,5</sup> supports CPAS concerns if it is found to be true.

The overriding problem with the ASMP and the MEIR is that they reflect one of the City Staff’s stated goals<sup>6</sup> of developing new revenue sources, which is in direct conflict with the Arroyo Seco Public Lands ordinance. This ordinance requires that the Arroyo Seco be preserved, protected and properly maintained. The ASMP and MEIR are not documents that the majority of residents would approve. No valid argument can be made that the ASMP and MEIR preserve, protect or maintain the Arroyo Seco because these documents propose (among other things):

- Removal of 69 acres of habitat below the 1030 flood line;
- Loss of 4.5 acres of Willow Scrub;
- Building of fake lakes and stream beds;
- Loss of 17 acres of dense willows;
- Destruction of natural wetlands;
- Encroachment on natural preservation area by parking lots, roads and asphalt pathways;
- Adverse impacts on existing plant and species habitat;
- Increased air emissions from increased traffic;
- Increased noise;
- Removal of 430,000 cubic yards of soil; and
- No plans or funds to provide either deferred or continuing maintenance or to maintain new facilities and elements proposed.

### **Keep the Arroyo Natural**

Moreover, the ASMP and the MEIR fail to achieve restoration and conservation of the natural environment and historical aspects of the Arroyo while providing opportunities for uses of the Arroyo that support Policies 9.2 and 9.5 of the City’s Comprehensive General Plan (“GP”). These policies are to: (i) continue and complete comprehensive planning for, and implementation of, plans for the Arroyo, including restoration of the natural area of the Lower Arroyo and the development of the Devil’s Gate Dam Multipurpose Project;

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<sup>4</sup> Ibid

<sup>5</sup> Many of the following comments apply to more than one section in the MEIR. To the extent the comments made by CPAS apply to more than one section, CPAS incorporates by reference such comments as though they had been fully set forth in response to such section, even if such section is not identified by CPAS.

<sup>6</sup> MEIR Section 2.1 Statement of Objectives bullet point “*provide for new revenue – generating park facilities*”

(ii) encourage and promote the stewardship of Pasadena's natural environment, including water conservation, clean air, natural open space protection, and recycling; and (iii) encourage the use of native, water conserving and regionally appropriate landscaping."

These documents also fail to address issues identified in the Public Resources Code §21100 and 21100.1. They also fail to address impacts on the environment which is defined in Public Resources Code §21060.5 as the "*physical condition which exists within an area which will be affected by a project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance*".

MEIR Section 2.1, Statement of Objectives, includes the objective of providing "new revenue-generating park facilities". It is the position of CPAS that this objective should not have been considered as part of the ASMP and the MEIR. The generation of new revenue sources proposed in the HWP MP and LAMP are not compatible with the preservation, restoration and maintenance objectives desired by citizens.

CPAS maintains that the MEIR is legally deficient and does not comply with CEQA. Thus, we recommend that the City Council does **not** certify the MEIR, dated May 16, 2002, and that it directs Staff to revise all elements of the ASMP to reflect the desires of the citizens. The ASMP should have as its goal the preservation, restoration and maintenance of the part of our City that President Roosevelt proclaimed: "*Oh, Mr. Mayor, don't let them spoil that. Keep it just as it is!*"

We suggest that restoration of the stream that runs through the Arroyo Seco should be the focus of a rewritten Master Plan. The opportunity we have to restore and preserve this valuable natural resource for subsequent generations of Pasadenans and their neighbors should not be missed.

## II. Areas and Issues Of Known Controversy Not Addressed

The City fails to discuss the following six known controversies:

### 1. Flood Control Channel Removal

Removal of the concrete flood control channel has been a controversial issue supported by the public since its inception. The issue is controversial because the City does not support what the citizens want. Concepts from the Arroyo Seco Watershed Restoration Feasibility Study, a cooperative project of North East Trees and the Arroyo Seco Foundation, have not been incorporated into the ASMP, the most notable among these being the naturalization of the Arroyo Seco streambed and the removal of the concrete channel.

**Additional information and analysis required:** This study includes a wealth of information that should be used to present a conservation/habitat restoration alternative to the infrastructure and concrete/asphalt emphasis of the current plan and alternatives as detailed in the MEIR. The City of Pasadena has been aware that the Arroyo Seco Foundation was conducting a Watershed Restoration Feasibility Study. City staff attended some of the meetings, yet the City of Pasadena has failed to include many of the Arroyo Seco Foundation's findings in the current ASMP. Removal and restoration of the flood control channel is a viable possibility and must be included in if not the main focus of any ASMP & MEIR.

### 2. Bike path in the LAMP.

There is substantial concern regarding the inclusion of a bike path in the LAMP. Citizens have filed a successful lawsuit over this issue [*People for the Arroyo vs. City of Pasadena, 1999*], and continue to voice opposition to its consideration..

**Additional analysis required:** The repeated demands by citizens at numerous public meetings as well as the vote by the Parks and Recreation Commission in 2001 to remove mention of the proposed bike path in the LAMP needs to be included and considered as an area of controversy. This substantive issue is of major concern to citizens, as demonstrated by the ensuing lawsuit and other activities, including continuing public outcry at various hearings.

### 3. Hahamongna Parking Structure

The MEIR calls for moving 1,132 cars which are now parked on the east side of Hahamongna to a six-story parking structure on the west side of the park accessed via Oak Grove Drive and JPL. This garage is proposed to be built on the existing west parking lot next to JPL. Most of this lot is included within the Los Angeles County Flood Control easement.

**Additional analysis required:** It is impossible to comment on such a brief project description. The construction of a six story parking lot has many impacts on the

ecology and use of the basin. There is no indication of where the money is going to come from for this project.

**Additional information needed:** Why does the City propose to build a multi-million dollar parking structure within the Flood Control easement? Currently the City receives \$450,000 per year for the lease of the two parking lots in Hahamongna to JPL. How much income will be needed each year to pay off the cost of the garage? If the income from JPL is not adequate to pay for the garage, how will the difference be made up? The MEIR does not even mention how the maintenance costs of the garage are going to be paid for. Will the garage be rented out for other uses? How will this structure impact stream restoration?

**Additional analysis required:** How can the public and city decision makers adequately understand the environmental impacts of the garage(s) upon the park unless they know the types of additional uses for which the garage(s) will be used? The MEIR is deficient in the lack of specificity in its use of the term “park user” and its failure to address the real reasons why public access is proposed for the JPL parking garage in Hahamongna.

#### 4. Soccer Fields

The issue of providing more soccer fields is a noted area of controversy, yet the controversy section fails to even mention the inclusion of more soccer fields in Hahamongna. The doubling of turf grass areas was clearly controversial to those who attended the community outreach meetings. There was much concern over the effect of pesticides and fertilizers on both underground and stream water quality and habitat degradation. There is also concern over providing recreational areas for children who do not attend Pasadena Schools. The overwhelming preference at these meetings was for restoring Hahamongna as a natural area. The MEIR touts rigorous community outreach but then does not even mention the area of greatest controversy to the public who cared enough to get involved in the process.

**Additional analysis required:** Impacts related to increased use of pesticides and fertilizers, along with mechanical maintenance equipment such as mowers and blowers, upon water degradation and use of the soccer fields must be performed and it should be determined if the potential significant impacts outweigh the need for more soccer fields.

**Suggested alternatives:** Use of school facilities and other venues must be evaluated.

#### 5. Hahamongna Watershed Park Slip Lane

Use of the Oak Grove Park section of the Hahamongna Watershed Park lands being used by La Cañada High School has become an area of substantial controversy, which must be included in any final ASMP and subject to environmental review.

**Additional information and analysis required:** Hahamongna Watershed Park lands being used for a road by La Cañada High School is a controversial subject requiring additional information and analysis.

#### **6. Proposed MWD Property Lease**

The MEIR fails to adequately address projects proposed on MWD property. Pasadena recently issued a Negative Declaration for the long-term lease between the City of Pasadena and the Metropolitan Water District (“MWD”) for the approximately 29 acres of land owned by MWD in Hahamongna Watershed Park.

**Additional analysis required:** Because these proposed projects have environmental impacts, they should not be segmented out from the other projects under consideration in the MEIR. A Negative Declaration on the MWD lease is inappropriate. Unless all projects are considered at one time, decision makers and the public will be unable to assess accurately the significant cumulative effects of all projects upon the natural environment in Hahamongna.

### III. Basic Inadequacies of the ASMP and the MEIR

The ASMP and MEIR are woefully inadequate because they fail to properly address water resources issues, including the potential for flood channel removal and restoration, fail to consider the impact of increased Rose Bowl events, and fail to provide effective alternatives that would restore/conservate the existing character and natural assets of the Arroyo Seco.

The ASMP's and MEIR's description of the existing conditions in the Arroyo fail to capture the actual conditions of the Arroyo. **The result of this inadequate description is that the MEIR fails to adequately recognize the negative impacts of the Plan's proposed development of structures upon the natural state of the Arroyo.**

As set forth above, the essence of the Arroyo Seco is its natural state. This is what President Roosevelt saw in 1911. It is what *The Craftsman* wrote about in 1912. It is to be preserved and protected according to the City General Plan Objective 9. It forms the basis for the Cultural Heritage Commission's naming it a Landmark of the City of Pasadena. It is in great measure the basis for the Arroyo Seco Public Lands Ordinance's purpose to preserve, protect, and maintain the Arroyo, and to create the Lower Arroyo as a Natural Preservation Area. It is why the City Council, in 1974, refused to let the LA County Flood Control District channelize the free flowing stream under the Holly Street Bridge.

Most important, much of what identifies Pasadena today has sprung from the natural condition of the Arroyo. But for the natural Arroyo, Pasadena would not have the rich history we are so proud of and would be a much different city today.

**Additional information needed:** The ASMP completely misses the value or potential of the Arroyo Seco as a natural resource for citizens and the land. It has failed to continue the desires of the community for its restoration, preservation and protection.

**Additional analysis required:** The ASMP is made up of five sub areas but fails anywhere to address the Arroyo Seco in a holistic manner. Inter-relationships of all areas must be considered and evaluated in the MEIR. Biological resources, cultural resources, noise, trails and hydrology must be studied from both a regional perspective and a site perspective in order to be adequately understood and evaluated in the MEIR.

#### ***Other Specific Evidences of Inadequacy of the MEIR:***

1. The Draft MEIR fails to adequately define the difference between a Master EIR and a Project EIR. The MEIR also fails to contain "a list of permits and other approvals required to implement the project." (14 CCR §15124 (1) (B))

**Additional information required:** What are the specific permits the city will need to proceed with implementation of the projects noted in the MEIR and Master Plan?

2. The Executive Summaries contained in both documents lack (per 14 CCR §15123-executive Summary) among other things the following:

- Itemization of each significant effect and proposed mitigation within the plan;
- Areas of controversy known to the Lead Agency including issues raised by agencies and the public;
- Adequate identification of issues remaining to be resolved.

**Additional analysis required:** The ASMP and MEIR must be revised to include the above information and its effect on the environment.

3. There has been considerable public outpouring of frustration with a project that has taken many years to complete and which does not (in its present form) conform to the City's General Plan and Guiding Principles. A document has been prepared which reviews elements in the ASMP to determine compliance with the Elements in the General Plan and the City's seven Guiding Principles. (Please refer to VII. Cultural Resources.)

**Additional information needed:** Adequate and appropriate surveys of public opinion are missing from the environmental review which will demonstrate that citizens want to restore, preserve and protect the Arroyo Seco for future generations.

**Additional analysis required:** Elements in the ASMP and MEIR must comply with Elements of the City of Pasadena's General Plan and must also comply with the City's Guiding Principles. Elements which do not apply must either be fully mitigated or alternative found to ensure such compliance.

4. Although the friendly language of the Master Plan emphasizes restoring and naturalizing the Arroyo Seco, it is apparent that an underlying goal is to increase the number of active recreation areas and to develop new revenue sources for the City.

**Additional information needed:** Potential revenue sources must be identified in order to evaluate the impacts of the elements of the Plan. Use of the revenue must also be outlined to ensure that it is appropriate and thus the MEIR exceeds the direction and authority given for its preparation. This fact alone makes the MEIR a suspect document.

5. The ASMP and MEIR include elements and components that were not in the draft planning documents approved by the City Council in October, 2000 and at various other times. Also, the City Council has three new members since that time. The Lower Arroyo Seco Plan was approved in concept almost five years ago and during this intervening period, increased public awareness has occurred. Public sentiment may have changed, yet has not been considered in these documents. School children are taught at an early age that the best way to effect change in their way of life is to vote in new elected officials; yet changes in City government, as evidenced in actions taken by City Commissions, has not been factored into the ASMP and MEIR.

**Additional information needed:** How will the City of Pasadena consider updating the Master Plan in light of these changes?

**Additional analysis required:** Regional interests for increased soccer fields, bike paths and parking structures need to be balanced against the need for preserving natural space for the future. Once these features are added to the Arroyo, it will never be the same, its value will have been diluted and the natural balance will be disturbed.

6. The MEIR fails to provide (per 14 CCR §15176 (b) (4)) cost estimates for the proposed projects. The ASMP does provide a plan for sequencing the construction of the projects, but it fails to note that much of the funding will be obtained through grants and subsidies. No mention is made as to how the “big ticket” items will be funded. This lack of clarity can only result in a chaotic situation and put the city at risk financially. Both documents state that one of the City’s goals is to “*develop new revenue sources for the City*”.

**Additional analysis required:** The MEIR is inadequate because no potential revenue sources are identified and no need for revenue is identified.

**Additional information needed:** The City should define how it plans to use Hahamongna for large public events and if it proposes to use new off-site parking locations for Rose Bowl events. What are the current revenue sources for Hahamongna and how are they currently being used by the City? What are the potential “*revenue sources*” the City is planning on developing and how will the funds be used by the City?

**Additional information needed:** The public needs to see a projected budget and outline of funding sources for the ASMP in order to properly evaluate the MEIR. Funding available for stream restoration should be detailed.

**Additional analysis required:** Impacts of using Hahamongna and the Rose Bowl (e.g.) for additional and “large” events must be included in the MEIR.

7. The MEIR is deficient in not including concepts from the Arroyo Seco Watershed Restoration Feasibility Study<sup>7</sup>, a cooperative project of North East Trees and the Arroyo Seco Foundation. The most notable among these concepts being the naturalization of the Arroyo Seco streambed and the removal of the concrete channel. This study includes a wealth of information which could be used to present a conservation/habitat restoration alternative to the infrastructure and asphalt emphasis of the current plan and alternatives as detailed in the MEIR. The City of Pasadena has been aware that the Arroyo Seco Foundation was conducting a Watershed Restoration Feasibility Study. City Staff participated as members of the Agency Technical Review Committee attending numerous meetings, yet the City of Pasadena has failed to include much of the Arroyo Seco Foundation’s findings in the current ASMP.

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<sup>7</sup> Volume I & II; Funded by the California Coastal Conservancy & Santa Monica Mountains Conservancy/Mountains Recreation & Conservation Authority; Supported by the National Park Service, Rivers, Trails and Conservation Assistance Program, Los Angeles County Department of Public Works & the United States Army Corps of Engineers; Prepared for the California Coastal Conservancy; Prepared by North East Trees and Arroyo Seco Foundation; Dated May 31, 2002.

**Additional information required:** How will the City revise the ASMP in light of the findings?

8. It is apparent that some of the projects included in the MEIR already have Prop A funds set aside for them and are now awaiting approval of the MEIR to be implemented. Many of these projects are proposed by City Staff and are not necessarily supported by the community.

**Additional information needed:** What projects in the ASMP and MEIR already have funding?

**Additional analysis required:** Further hearings need to be held to determine the wishes of the public and impacts analyzed to provide the basis for consideration of MEIR certification.

9. The Philip Williams Study<sup>8</sup> was commissioned by Takata & Associates on behalf of the City of Pasadena as part of the HWP MP in 2000. The MEIR fails to reference it as an alternative to water management in Hahamongna Watershed Park. There is hardly a mention of the study that was dismissed because “*it failed to address the realities of Southern California Water practices.*” In short the City failed to discuss this significant alternative plan per 14 California Code of Regulations (“14 CCR”) §15126.6 (Discussion of Alternative Projects).

**Additional information needed:** What were the specific reasons the City dismissed the finding of the study? Will the City consider revising the MEIR to include the findings of the Philip Williams Study? How, in fact was the study used?

**Additional analysis required:** The MEIR is deficient because it does not consider the Philip Williams study approach and other hydrological alternatives.

10. 14 CCR §15176 (b) (4) states a Lead Agency shall provide: “*A capital outlay or capital improvement program, or other scheduling or implementing device that governs the submission and approval of subsequent projects, or an explanation as to why practical planning considerations render it impractical to identify any such program or scheduling or other device at the time of preparing the Master EIR.*”

**Additional analysis required:** The City provides no capital outlay or capital improvement program, and there is no pro forma budget provided for public review. How are the projects are to be financed? What is a potential schedule for project completion? Documentation is missing that provides reasons for the omission of a capital outlay or capital improvement program. It is impossible to comment effectively on the MEIR without this information.

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<sup>8</sup> Takata & Associates, January 17, 2000, *Flood Hazzard, Sediment Management, and Water Feature Analyses, Hahamongna Watershed Park, Pasadena, CA*. Prepared by: Phillip Williams Associates, Ltd.

11. 14 CCR § 15176 (c) states the Lead Agency shall include: *“A description of potential impacts of anticipated projects...”*

**Additional information needed:** The layout of the MEIR makes it very difficult for the public to assess the project impacts. Section 2.0, Project Descriptions, is in one format, while Section 3.0, Existing Conditions, Impacts, Mitigation Measure, and level of Significance After Mitigation, is in an entirely different format and organization. To facilitate effective comment the MEIR should handle project impacts under each project heading. In addition, the cumulative impacts of the projects should be discussed.

12. 14 CCR § 15124 (c) states the Lead Agency should provide: *“A general description of the project’s technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities”*.

**Additional information needed:** Again there is inadequate description. For example, the new parking structure in the Hahamongna Watershed Plan, a major engineering project with considerable impact, receives less than a page of description.

13. 14 CCR § 15124 (d) (1) (B) states the description of the project shall contain: *“A list of permits and other approvals required to implement the project”*.

**Additional information needed:** None of the project descriptions in the MEIR contain any such list. Please provide this list.

14. 14 CCR § 15131 (b) states that the social impacts of the project may be included in an EIR: *“Economic or social effects of a project may be used to determine the significance of physical changes caused by the project”*.

Pasadena citizens agree that social impacts are important to the planning process. Objective #1 of the City’s General Plan Social Element provides for: *“A comprehensive planning process which includes social needs and social impacts as integral components in public decision-making.”*

The General Plan continues to require, under Policy #1 of the Implementation Strategies and Policies: *“...the City shall determine and evaluate the social impacts of major physical, environmental, economic and social changes, where the City has appropriate authority. The social impacts of such changes shall be given at least equal standing with other factors in determining their acceptability.”*

**Additional information needed:** Neither the ASMP nor the MEIR contain any reference to social impacts. There will be a significant adverse effect on the use and enjoyment of a natural habitat area by encroaching projects identified in the MEIR. These projects will bring noise, traffic and pollution to the Arroyo Seco which will adversely impact wildlife, vegetation and tranquility. In a congested City, which Pasadena has become as can be seen by the traffic congestion, people need a peaceful place to relax, meditate, exercise and commune with nature.

**Additional analysis required:** The MEIR fails to address these social impacts and it also fails to address the corresponding favorable social and economic impact that will result from stream restoration.

Furthermore, the children of Pasadena and particularly those at the lower socio-economic levels, deserve an accessible natural preserve in order to learn about animals, trees, birds, streams and the tranquility that nature can provide. Children have enough asphalt and concrete in their lives already.

**Additional analysis required:** This huge social impact on the quality of life for Pasadena residents is amazingly not even mentioned in the MEIR and must be considered. Moreover, there is no analysis about the uniqueness of the Arroyo Seco in the urban environment, the opportunities it provides to educate our children about wildlife, plants, seasons and rivers, the uplifting impact restoration would have on the communities sense of hope and well being and the fact that this may be the last chance the City has to live up to the visions of Theodore Roosevelt and countless others who followed him.

15. Discussion of the Guidelines by the Office of Planning & Research (“OPR”) cites case law declaring *“that an accurate, stable, finite project description is an essential element of an informative and legally sufficient EIR under CEQA”*.

The MEIR and ASMP project descriptions are often vaguely worded and fail to describe the specific work to be done so as to adequately determine the environmental impact of the proposed work. In this manner, the more general the description, the more general are the impact analysis and mitigation measures. Key information is scattered throughout the documents so that it makes it nearly impossible for a lay person to fully evaluate the impacts.

The City consistently fails to recognize the local community as a primary stakeholder in the project. As a result, it is difficult to look at the MEIR and make thoughtful suggestions. Project descriptions are cursory and contain little or no detail about impacts, permitting or financing. Detail on how these projects are to be completed is missing and descriptions fall short of CEQA requirements for MEIRs. As they stand, most projects will require additional environmental documentation and public comment before they can be completed.

**Additional information needed:** Please provide more detailed descriptions throughout the ASMP and MEIR that include, but are not limited to, accurate drawings, precise location and finite dimensions, etc. The public needs to have adequate time to evaluate the impacts and respond to a revised MEIR.

16. According to the CEQA Deskbook, 1999 (Second) Edition, pg. 14, *“...a lead Agency is required to make changes in a project to lessen or avoid significant effects, when feasible, or to disapprove a project to avoid significant effects unless the project’s benefits outweigh these effects”*. The MEIR concludes that the project, as stated in the ASMP, will have significant negative effects on the environment.

**Additional analysis required:** Describe the overriding benefits that outweigh the destruction of so much natural plant, animal habitat and streambed. Explain why the goals of the region, for more landscaped recreational areas, are more important than the wishes of the citizens of the City of Pasadena who treasure this natural area and want to preserve it for themselves and for future generations.

17. The MEIR is deficient in that two key numbers listed are higher than the numbers which appear in the HWP MP. The HWP MP states that the projects in Hahamongna include the construction of “a six-story, 1,200 space parking structure on the existing west parking lot site” (HWP MP, p.3-54). In the Aesthetics Section of the MEIR, however, the parking structure is described as “a six-level parking structure capable of accommodating the existing 1,700 parking spaces.” (MEIR, Section 3.1.4.1.1).

**Additional information needed:** Clarification is needed regarding the number of parking spaces planned for this parking structure. Why does the MEIR propose a parking structure with 500 more spaces than that proposed in the HWP MP? The MEIR must be corrected to provide accurate information, to conform to the HWP MP.

18. There is a discrepancy regarding the number of parking spaces to remain on the east side of Hahamongna. The MEIR states that: “the existing parking lot on the coast (sic) side of the arroyo, leased for exclusive use by Jet Propulsion Laboratory (“JPL”), would be converted to public use. The parking lot would continue to have a capacity of 600 parking spaces” (MEIR, Section 2.3.1.15.1).

**Additional information needed:** Why does the number of remaining east side parking spaces bear no relationship to that found in the HWP MP?

The HWP MP states that: “eastside visitor parking will consist of 200 spaces located on the northern portion of the existing JPL east lot” (HWP MP, p. 3-56).

**Additional information needed:** Please explain why the MEIR triples the amount of parking remaining on the east side of Hahamongna? Why is the number of parking spaces to remain on the east side of Hahamongna increased in the MEIR over that approved by the City Council in the Conceptual HWP MP?

19. Under CEQA the purpose of the MEIR is to evaluate the projects set forth in the Master Plan, not to set forth new and expanded projects. The impacts on noise, air pollution, traffic, light pollution, habitat destruction, etc. are not adequate if based upon 200 cars rather than the 600 described in the MEIR if the latter is the actual number of parking spaces which will remain.

**Additional information needed and analysis required:** These inconsistencies should be explained.

20. The MEIR fails to adequately address projects planned on MWD property. Pasadena recently issued a Negative Declaration for the long-term lease between the City of Pasadena and the Metropolitan Water District (“MWD”) for the approximately 29 acres of land owned by MWD in Hahamongna Watershed Park. A Negative

Declaration is improper at this time. The proposed lease between Pasadena and MWD is the first step in the process which will allow all subsequent physical projects to be completed and as such the lease should be included as part of Pasadena's ongoing environmental review of the plans for the Arroyo Seco, particularly stream restoration.

Several projects on the MWD land are discussed in the HWP MP and/or the MEIR as well as in community and committee meetings. These projects include a new road, a bike path, an interpretive center and a native plant nursery, a portion of a spreading basin, and a portion of the park perimeter road/trail. Their inclusion provides substantial evidence in the record that Pasadena does intend to develop the MWD property despite repeated assurances in the ASMP Initial Study for the MWD Property Lease ("MWD Initial Study") that Pasadena "is not proposing any physical change to the site."

**Additional analysis required:** Because these proposed projects have environmental impacts, which should not be segmented out from the other projects under consideration in the MEIR, a Negative Declaration on the MWD lease is inappropriate. Unless all projects are considered at one time, decision makers and the public will be unable to assess accurately the significant cumulative effects of all projects upon the natural environment in Hahamongna.

21. The MEIR includes in the project descriptions a 1,200 space parking garage (also described as a 1,700 space garage) (MEIR, Section 3.1.4.1.1) to be built on the existing west parking lot next to JPL which would be "made available to recreational park users" (MEIR Section 2.0 Project Description, Section 2.3.1.11.1). To reach this garage, the city plans to use "the old park road that bisects the MWD property for both vehicle and bicycle access to the parking structure..." (MEIR, Section 2.3.1.11.2). This road, which no longer exists, is referred to in the HWP MP and the MEIR as the West Arroyo Inner Park Access (HWP MP, p.3-46 and MEIR, Section 2.3.1.11.2). Section 4 of the HWP MP includes a list of projects to be implemented. Under the Oak Grove area improvements are listed as part of Phase 1F: "Construct the West Arroyo Inner Park Access and equestrian refuse disposal area. Review alternatives, approve and begin construction of 1,200 space JPL parking structure(s)" (HWP MP, p.4-4).

**Additional information needed:** What is the correct number of parking spaces proposed for the parking garage? Who are the "recreational users" that the garage is being made available to? Why is the City planning to use a park road which no longer exists? Will a new road be built? If so, where? Please identify on a relevant map, the location of any new road to any proposed parking structure and proposed lot.

**Additional information needed:** What is the need for this lot? What are the supporting facts demonstrating need? What is the current parking count in the area? What new parking needs justify a huge expenditure for a six-story parking structure which will have an adverse effect on the environment?

22. A bike path is also proposed which would follow the perimeter of Hahamongna on existing vehicle roads and the proposed “paved road through the MWD property” (MEIR Section 2.3.1.11.2 West Arroyo Inner Park Access. The bike path will be on the 32’ wide road with an adjacent 8’ equestrian/hiking trail.

**Additional analysis required:** The environmental impacts of this road would be very significant and should be addressed during the current environmental review process, especially since the road is listed as one of the projects to be implemented. When the citizens are asking to remove cement, it seems counterproductive to pour more cement.

23. The HWP MP proposed a center where visitors could learn about: “*the Arroyo Seco environment, water resources and conservation, flood management, and the Native American culture*”. An ideal location for the Interpretive Center would be on a portion of the adjacent property currently owned by the Metropolitan Water District.” (HWP MP, p. 3-71) The following features are recommended in the HWP MP (HWP MP, p. 3-71 and 3-72):

- A large flexible space dedicated to exhibits and demonstrations
- Classroom space for instruction
- Auditorium/conference space for up to 200 people
- Multi-purpose covered patio for large groups
- Work area to prepare or repair exhibits
- Administrative offices
- Storage area and janitorial/sanitary facilities
- Expanded nursery facilities for plant propagation
- Large kitchen for group service
- Maintenance and storage yard

**Additional analysis required:** If this major project is still under consideration, it should be included within the ongoing MEIR so that city decision makers and the public will be able to assess accurately the cumulative effects of all projects upon the natural environment in Hahamongna.

24. The MWD property referred to in the MWD Initial Study as No. 4 “City of Pasadena Boulder Storage Area.” has been treated in both the HWP MP and the MEIR as if the lease with MWD had already been signed and the property were already under the control of the City of Pasadena. For example, the Map of Hahamongna Watershed Park (following p. 3-1 in the HWP MP) and Exhibit 3-8 (following p. 3-35 in the HWP MP) show a portion of Spreading Basin No. 15 and a portion of the park perimeter road/trail as being located on the MWD property. The environmental impacts of the spreading basins and the park perimeter road/trail are discussed in the ongoing MEIR.

**Additional analysis required:** Because the environmental impacts of the projects under consideration for this section of the MWD property are included in the MEIR,

other projects proposed for other portions of the MWD property should also be considered in the ongoing environmental review process.

**Additional analysis required:** There is ample evidence in the record that these projects described above are under consideration. If this is the case, the cumulative impacts of the projects on the MWD property must be considered in the current MEIR. To consider these projects at a later date would be segmenting the project so as to avoid revealing to the public how pervasive the overall environmental impacts will be.

**Additional analysis required:** If the purpose of the proposed Interpretive Center (HWP MP, 3.11 Programs) is to “*communicate the importance of the Arroyo Seco and its environmental resources...*”, the MEIR must analyze the educational impact on the public of two artificial lakes with impermeable bottoms that propose to imitate a natural wetland and similarly the artificial stream. How will these components illustrate the reality of water issues in Southern California?

25. The MEIR fails to include a comprehensive safety plan for review. Taking into account problems with vandalism in the lower Arroyo and elsewhere, the City needs to consider how it will protect citizens and the beauty of the Arroyo Seco, presuming the increase in use anticipated by the plan.

**Additional analysis required:** The City should consider a safety plan for the Arroyo Seco that affords protection for citizens and also protects the natural resources from being covered with graffiti or carvings.

## IV. Potential Impacts Found Not to be Significant

### Land Use and Planning

The MEIR states that the ASMP Initial Study concluded that “the proposed project would have less than significant or no impacts on. . .Land Use and Planning”.

**Additional analysis required:** revise assumptions in the MEIR to include significant impacts on land use and planning. The proposed ASMP does not include goals required by the City’s General Plan and Guiding Principles. The City of Pasadena’s Arroyo Seco Public Lands Ordinance [Ord. 6403 §2 (part), 1990] (§3.32.020) requires the Arroyo Seco “be preserved, protected and properly maintained.” These goals of preservation, protection and maintenance must be included and therefore subject to environmental review.

**The following comments are directed to the sections of the MEIR indicated:**

#### 1.1 Project History

The MEIR History fails to include several sections of information:

- Historical information that was included in the April 15, 1996 Draft Master Plan for the Lower Arroyo Seco, including formation of the San Gabriel Mountains followed by faulting, earthquakes and erosion which eventually created the canyon now called the Arroyo Seco.
- Previous Master Plan documents dating back to the early 1970s, and including information pertaining to lawsuit(s) concerning a potential bike path.

**Additional information required:** revise the MEIR to include full documentation of efforts by City staff and citizens to describe project goals, guidelines and action plans to ensure that the new ASMP and MEIR accurately memorialize citizen input and concerns.

#### 1.2 Project Purpose and Need

The MEIR states as its purpose: “*...to support Policy 9.2 of the City of Pasadena’s Comprehensive General Plan and provide passive and active recreation facilities and programs to meet the diverse needs of City of Pasadena residents and visitors.*”

Missing from this purpose is any recognition of the General Provisions of the City of Pasadena’s Arroyo Seco Public Lands Ordinance [Ord. 6403 §2 (part), 1990] (see Appendix C) which includes in its purpose (§3.32.020) “*...to establish regulations for preservation, enhancement and enjoyment of the Arroyo Seco as a unique environmental, recreational and cultural resource of the city...such resource and the neighborhoods must be preserved, protected and properly maintained.*”

**Additional analysis required:** revise assumptions in the MEIR based on General Provisions of the Arroyo Seco Public Lands Ordinance which requires the resource that is the Arroyo Seco “be preserved, protected and properly maintained”.

### 1.3 Purpose of the MEIR

According to the MEIR, §15200 of the 1998 State CEQA Guidelines, defines the purpose of the review of an EIR as including (a) sharing expertise; (b) disclosing agency analyses; (c) checking for accuracy; (d) detecting omissions; (e) discovering public concerns; and (4) soliciting counter proposals.

**Additional information required:** CEQA allows sharing of expertise. The North East Trees and Arroyo Seco Foundation have collaborated with 14 state and federal agencies to develop the recently released “Arroyo Seco Watershed Restoration Feasibility Study – Phase II”. This document must be included and considered in any formulation of goals for the Arroyo Seco.

### 2.1 Statement of Objectives

The MEIR states (Section 2.1) that “The following objectives have been identified to support the ASMP goals”, yet there is no explanation of the analysis undertaken for substantiating the fact that the goals are worthy or desirable by the public.

- ***Implement Proposition A funding for Hahamongna Watershed Park***

Proposition A describes a “park” as: *“A tract of land with scenic, natural, open-space, or recreational values set apart to conserve natural, scenic, cultural, historical or ecological resources for present and future generations and to be used by the public as a place for rest, recreation, education, exercise, inspiration or enjoyment”*.

Section 4 of Proposition A further states: *“It is the intent of this order and proposition to provide funds to benefit property and improve quality of life in the District by preserving and protecting the beach, wildlife, park, recreation and natural lands of the District, providing safer recreation areas for all residents, preventing gangs, developing and improving recreation facilities for senior citizens, planting trees, building trails and restoring rivers and streams.”*

**Additional analysis required:** The capital improvements planned for HWP subvert the intent of Proposition A. There is no commitment to wildlife preservation or restoration of the stream. The taxpayers have a right of complaint if Proposition A funds are used to complete the projects as described in the MEIR.

- ***Update the Arroyo Seco Public Lands Ordinance***

**Additional information needed:** The specific changes the City is planning for this ordinance must be revealed. The public must be informed and allowed to participate in hearings prior to any City Council vote. When will public hearing be held on the matter, and how will the city give public notice on the hearings? Would certification of the MEIR and adoption of the ASMP mean that the ordinances could automatically be updated

without further action on behalf of the City Council and without further Public hearings?

- ***Develop a maintenance plan for existing park facilities***

The failure of the City to provide adequate stewardship for maintaining the treasure that is the Arroyo Seco must not be allowed to continue. The ASMP does not provide specifics for maintenance for current or planned facilities and improvements. The lack of maintenance potentially causes significant environmental impacts which must be evaluated.

**Additional information needed:** Plans for deferred and ongoing maintenance must be included in the ASMP in order for the Plan to be feasible. Failure to provide maintenance has potential significant environmental impacts. The word facilities needs to be defined and the objective needs clarification. Maintenance is required throughout the Arroyo Seco, not just for “facilities”.

**Suggested alternative objective:** To develop a budget for and fund a maintenance plan for existing and new facilities which includes a safety component and a fire suppression component. New facilities will not be built without adequate funding for personnel and maintenance.

- ***Provide Americans with disabilities Act (“ADA”) access for most of the facilities***

**Additional information needed:** This statement is ambiguous and indeterminate – “most” and “facilities” must be defined. To provide ADA access (as defined in the Americans with Disabilities’ Act) to many trails may not be reasonable. On the other hand, any facilities that qualify as buildings must provide ADA access by law. This objective needs clarification.

**Suggested alternative:** To promote the development of access for physically challenged people in compliance with the spirit of the ADA.

## V. Comments on Aesthetics

### 1. Section 3.1.2 of the MEIR – Scenic Vistas

The MEIR describes the existing scenic vistas as suburban and urban in vicinity. Within the project area they are more natural or rural.

**Additional analysis required:** In order to adequately evaluate the environmental impacts relative to aesthetics, the conditions must be appropriately described.

### 2. Section 3.1.4.1.2 of the MEIR – Artificial Streams and Ponds

Construction of an artificial stream and ponds is significantly inconsistent with a natural setting. It is contradictory to the goals of preservation, protection and maintenance of the Arroyo Seco.

**Additional analysis required:** Artificial streams and ponds do not improve a natural setting nor do they convey a true vision of the setting. They are not as cost effective as simply removing the concrete culvert. This factor must be further analyzed for impacts.

### 3. Section 2.3.4.2.3 and 2.3.4.3 of the MEIR – Widening and Pavement of Roads

Widening and pavement of roadways at current main entrance and proposed south entrance and picnic area and parking lot at south entrance of the Lower Arroyo Seco are not addressed. Widening and paving roads is inconsistent with the goal of protecting wildlife, night creatures, as is construction of new roadways. Anytime roads are widened or new roads are constructed, the natural setting is disturbed. There is no need for a 24 foot wide new road at the south entrance. Widening of the existing main entrance road will require considerable grading, fill and destruction of existing vegetation, including mature trees. No justification is given for the width of either road except the implied need to provide space for bicycles which are currently prohibited by ordinance in the Lower Arroyo.

**Additional analysis required:** There are significant environmental impacts to aesthetics for these features which must be evaluated. New pavement and construction will take up considerable open space, will have significant impact on visual aspect of native area and will require continued maintenance. It is also expensive and not necessary in a wilderness area.

### 4. Camel's Hump Changes

Work on Camel's Hump will have significant visual impacts on this prominent landmark.

**Additional analysis required:** this popular spot is treasured by people who visit the Lower Arroyo. The visual impacts of working on Camel's Hump must be evaluated. The MEIR is deficient because it does not state what changes are proposed or evaluate the likely aesthetic impact of those changes.

## 5. Parking Structure in Hahamongna Watershed Park

Section 3.1 (Aesthetics) of the MEIR concludes that construction of the six-story parking structure in Hahamongna Watershed Park constitutes a significant impact on aesthetic resources, which cannot be mitigated. However, Section 3.1. does not provide any figures, photographs, or drawings illustrating the location or character of the proposed parking structure. Figure 2.3.1-1 in Section 2.0 of the MEIR identifies the location of the structure.

**Additional information needed:** The scale of Figure 2.3.1-1 makes it impossible to evaluate what existing vistas would be affected by construction of the parking structure. Moreover, the MEIR does not provide any type of vista simulation or analysis illustrating “before” and “after” scenarios from various locations in and around HWP. The lack of supporting data in the MEIR, in effect, requires interested parties to estimate where the structure would be located, approximate its size relative to other buildings, and speculate as to whether or not they would be affected by this project element.

**Additional information needed:** Please accurately define the location of the parking structure. Will the mitigation measures (berming, vegetative treatment, etc.) be within the planned footprint of the structure or will it encroach further into park land?

**Additional analysis required:** The discussion contained in Section 3.1 of the MEIR on the aesthetic impact of the parking structure is inadequate, and does not represent full disclosure of a significant impact to affected parties under CEQA guidelines.

**Additional analysis required:** Please prepare an analysis that fully represents the aesthetic impacts associated with the proposed parking structure. A vista analysis should be prepared that fully represents the aesthetic impacts associated with the proposed parking structure. This analysis would include a simulation from various viewpoints in the vicinity of the structure and the clear identification of affected parties (e.g. Altadena residents located along the east bank of the Arroyo Seco, park users, etc.).

**Suggested alternative plan:** As mitigation, the height of the proposed parking structure should not exceed the height of adjacent buildings. However, the best alternative plan would be that no parking structures be built.

## 6. Parking Lot Surfaces

Section 3.1 of the MEIR states that: “The HWP MP element in the Arroyo Seco Master Plan would replace existing surface parking lots with a six-level parking structure capable of accommodating the existing 1,700 parking spaces.” This statement is untrue. The project description states that 600 spaces of the current JPL east parking lot would remain under the proposed project. The project description also proposes approximately 1100 new parking spaces and 12 bus spaces in HWP.

**Additional analysis required:** Since the project proposes a substantial *increase* in parking lots as opposed to the replacement of any existing parking lots, the description of the proposed project should be refined and described accurately. The increase **must** be environmentally evaluated. The MEIR needs to address the aesthetic impact of placing a significant number of new parking spaces in a natural park and support the conclusion that approximately 1,100 new parking spaces in a natural park does not constitute a significant cumulative impact on aesthetic resources.

## 7. Visual Impact of Vehicles

The aesthetics section does not address the visual impact of the asphalt, buses, and automobiles associated with these new parking lots. Moreover, the MEIR states that the proposed project in HWP MP does not constitute a significant cumulative impact on aesthetic resources.

**Additional analysis required:** the visual and environmental impact of the asphalt, buses, and automobiles associated with these new parking lots must be evaluated.

## 8. Section 2.3.4.6.3 of the MEIR – Archery Lane (& Casting Pond) signage

Archery trails would be defined with improved signage utilizing orange safety cones to identify archer shooting lanes and to alert other archers that the range is in use.

**Additional analysis required:** The MEIR does not fully describe the proposed signage, which is a deficiency in the MEIR Design Standards Section. In order to adequately evaluate the environmental impacts relative to aesthetics, the conditions must be appropriately described.

**Additional information needed:** What is the purpose for the signage and why is it needed? The archery range should be as unobtrusive as possible. There are no reported problems of interference of walkers, joggers or equestrians with archers as all shooting areas are west of the trail. The range area west of the trail is rugged and does not attract walkers or equestrians. Existing small, discreet signs already direct intruders to the existing trail.

**Additional analysis required:** The MEIR does not adequately describe or define signage in the Design Standards section. The aesthetics effects need to be evaluated in view of a natural preservation area.

**Suggested alternative:** Provide only signage which relate directly to facilities such as casting pond, archery range, etc. Directional signage on trails is unnecessary since trails are well established and easily visible, inconsistent with the desired natural characteristics of the area, would be costly to maintain and would be targets for graffiti.

**9. Sections 2.3.4.8.6, 2.3.4.1.4, and 2.3.4.5.6 calls for improved directional signage.**

**Additional information needed:** What does this mean and why is it needed? Signage in a natural preservation area is not needed and would require maintenance.

**Additional analysis required:** The aesthetics effects need to be evaluated relevant to a natural preservation area.

**10. Sections 2.3.4.2.3. – Improved Lighting**

Calls for improved lighting – quantity is not defined. The Lower Arroyo is closed at sunset, so lighting that is obtrusive and disturbing to residents along the Arroyo is not necessary. Impacts on wildlife need to be assessed.

**Additional analysis required:** Mitigation for the negative effect of light disturbing residents is inadequately provided in the MEIR. The proposed lighting is not adequately described in the Design Standards section. Physical location of lighting is not indicated so total effect on the residents cannot be adequately addressed. The MEIR denies obvious aesthetic impact thresholds in Section 3.1.3 Lighting in natural areas is inconsistent. Lighting also can cause glare, and will interrupt the pleasure of viewing nature under the stars. Again, lighting seems in opposition to the restoration of a nature area.

**Additional analysis required:** There are significant environmental impacts to aesthetics for these features which must be evaluated.

**11. Section 3.1.4.1.2 of the MEIR – Overhead transmission lines**

The MEIR proposes the relocation of 2,000 linear feet of overhead transmission lines to the Gabrielino Trail, relocation of a Pasadena Power and Communication line along the Gabrielino Trail, and the “raising” of a SCE transmission line located in Hahamonga Basin. The MEIR states that the aesthetic of the existing utility lines is “undesirable”. Conversely, Section 3.1.4.1.2 of the MEIR (Aesthetics) states that the relocation of these very same “undesirable” utility lines (utility improvements) is an issue that “would not be expected to degrade . . . the qualities of the site and its surroundings” and therefore, the relocation and raising of these lines has “no impact” on aesthetic resources. Section 3.1.4.1.2 further states: “Utility improvements to the Hahamongna Watershed Park are consistent with Policy 5.9 of the City of Pasadena’s General Plan [sic]”. General Plan Policy 5.9 reads as follows: “Urban design programs shall ensure that new development shall respect Pasadena’s heritage by requiring that new development respond to its context and be compatible with the traditions and character of Pasadena and shall promote orderly development that is compatible with its surrounding scale and that protects the privacy and access to light and air of surrounding properties.”

**Additional analysis required:** Please clarify how placement of utility lines along a recreational trail is development that “responds to its context” and is “compatible with its surrounding scale” as stated in Policy 5.9 of the General Plan when in fact, it can

be asserted that placement of these utilities along a recreational trail is in direct conflict with this policy. If the transmission lines were placed underground, a significance conclusion of “no impact” would be plausible; however, the MEIR does not obligate the City to place these lines underground.

**Additional analysis required:** A significant conclusion of no aesthetic impact is in direct conflict with descriptive statements made earlier in the document and is not supported by Policy 5.9 of the General Plan. Surely, if the power lines are undesirable, relocating an undesirable element adjacent to residents and trail users clearly constitutes an adverse aesthetic impact.

**Additional analysis required:** The construction impacts associated with the relocation of these lines are not addressed in the MEIR. CPAS requests that the aesthetic, noise, health and air quality impacts associated with the relocation of these power lines be properly addressed in the MEIR.

#### **12. Section 2.3.4.2.4 of the MEIR – Widen Access Road (LAMP, Main Entrance)**

This section calls for widening the road to 24 feet and building a **crib wall**, clearing brush from the hillside. This project is in contrast to the Draft Master Plan for LAMP, May 2002, Section 3.2.5 Circulation and Parking, in which the *recommendations* include the following: “*Do not expand existing entrance or main parking area.*”

**Additional information needed:** Please explain this seeming disconnect.

**Additional analysis needed:** The construction of a crib wall and removal of “brush” (undefined and possibly appropriate plant material) will certainly have a **significant visual impact** in a natural area.

#### **13. Section 2.3.4.3 of MEIR – New South Entrance (LAMP)**

According to the MEIR, this proposal, calls for picnic tables, a kiosk and interpretive area, restroom (1,000 sq. ft), equestrian facilities, and parking area (approximately 1 acre) with “20 spaces – 10 automobiles, 1 ADA space, 1 bus space and 8 horse trailers”, plus signage and a 100’ long multi-use trail at least 14’ wide, .

**Additional analysis required:** The MEIR does not address the visual impacts of these very significant “improvements” in the section on aesthetics. Additions such as those listed will certainly attract vandalism and trash, which will draw nuisance birds such as crows, ravens, and pigeons. The impacts of these additions on aesthetics must be addressed.

#### **14. Section 2.3.4.18 of MEIR – Create an Open Natural Area (LAMP)**

This section calls for the removal of 60,000 square feet of brush removal (native?, exotic?) and slope stabilization.

**Additional information needed:** What is involved in slope stabilization?

**Analysis Required:** What will be the visual/aesthetic impact of slope stabilization?

## VI. Comments on Biological Resources

Throughout the ASMP and the MEIR, the term *habitat* is used extensively. In some instances it refers to areas inhabited by wildlife, in other cases it refers to active recreation areas that have been landscaped (i.e. disc golf) as habitat.. Habitat is described in Webster's New World Dictionary as the "*region where a plant or animal naturally lives*". Throughout the MEIR it appears that little regard has been given to the animals that naturally live in the Arroyo Seco.

**Additional information needed:** How does the City define the meaning of "habitat" and "quality habitat" as it is used in these documents? The MEIR is inadequate because it does not properly define habitat and differentiate between various grades of habitat.

**Additional analysis required:** A strong commitment to sustaining and increasing the quality of wildlife habitat throughout the Arroyo Seco is missing from the ASMP and evaluated in the MEIR. This must be included in both documents.

### 1. Habitat used by wild animals throughout the Arroyo.

In the Hahamongna Watershed portion of the MEIR many of the proposed projects would destroy the plant habitat necessary for the wildlife that currently inhabit that area. The expansion of the trail in the Camel's Hump region (Section 2.3.4.13.1) and the clearance of brush along the Busch Gardens (Section 2.3.4.13.3) would effectively wipe out the habitat currently used by small animals in the area. The Westside trail widening will split many current habitat areas with a wide, unneeded trail for bicycle riders.

**Additional information needed:** What mitigation measures will be put in place to avoid the destruction of and promote the preservation of current wildlife habitat in these significant areas?

### 2. Grading and Paving Effects on Habitat

The HWP MP is based on massive grading of the basin destroying existing consolidated habitat and replacing it with fragmented "landscaped" habitat interspersed among active recreation areas. Good habitat for wildlife is not necessarily good habitat for humans. CPAS hopes that the city would reevaluate the current plan in an effort to create large areas of natural habitat and locate the active recreation to areas that are located on the extreme edges of the basin. Additionally, the construction of two lakes and adjacent imitation streams will encourage human incursion through fishing and water play at the expense of wildlife. Both features would require significant artificial infrastructure to keep them operating and will foster the introduction of non-native fish and amphibians, which is antithetical to the preservation and the protection of the Arroyo Seco.

**Additional information needed:** The City could amend the plan by landscaping these features to discourage active recreation (fishing, water play).

**Additional information needed:** The City should consider revising the plan to include the creation of “shaded paths or blinds” which would allow for observation with a minimum of human presence.

**Suggested alternative:** Given the current plan’s fragmentation of the wildlife habitat and the increased human incursion in to the natural areas, it is suggested that the HWP MP be revised to consolidate human and wildlife areas similar to Prado and Sepulveda Basins. The current location of the spreading basins above the dam and proposed water conservation measures proposed in the HWP MP seem to increase infrastructure and their related costs in an attempt to fix a problem by making it more complex than needed. In most instances, spreading basins are located below a dam. In the case of Pasadena, it would mean their location in the Central Arroyo Seco. CPAS would like to see the City consider designing the whole basin to become the spreading basin as recommended in the Philip Williams & Associates study.

**Additional alternatives to consider:** To revise the HWP MP to consolidate active recreation areas on the eastside to the NE corner of the basin on existing disturbed land (JPL East Lot was built as a temporary arrangement) by locating the Johnson Field (never properly permitted and built by City employees)-Basin 13 recreation fields and 200 space parking lot to the JPL East Lot. Additionally, the proposed 1200 space parking lot proposed on the NW edge of the park could be located in the same area and could be configured so that a portion would be open for public parking and the rest could remain under JPL’s control. This would eliminate a significant number of new parking spaces and disturb less of the existing habitat in the Hahamongna Basin.

### **3. Section 3.0 – Existing Conditions, Impacts, Mitigation, and Level of significance after Mitigation.**

**Additional information needed:** What specific criteria were used to determine the Levels of Significance for Biological Resources? Do biologists commonly accept these levels or are they established by the City of Pasadena?

### **4. Section 2.3.1.18 – Habitat Conservation**

The MEIR uses the word “rural” instead of “ruderal”.

**Additional analysis required:** The MEIR is deficient in that it does not evaluate the destruction of existing high quality habitat, such as the riparian zone near the dam and the Riversidean alluvial sage scrub habitat.

**Additional information needed:** With the proposed removal of 69 acres of habitat below the 1030 flood line, how does the Plan hope to achieve sufficient contiguous habitat to sustain a wildlife population? There is discussion of endangered species but no discussion of existing resident species and how they might be impacted by the project. What are the goals in regard to existing species in the basin?

**Additional information needed:** Please be clear about how an “Interpretive Center” will work.

**Additional analysis required:** How are these goals going to be achieved with the introduction of roads, parking lots, pipelines and expanded spreading basins. None of these elements are natural or support wildlife.

#### 5. Measure Biological-2 Executive Summary – Unavoidable loss of wetlands and riparian habitats

The MEIR fails to analyze the wetlands issues as well as riparian habitats.

**Additional information needed:** Will the City obtain a Section 404 permit from the Army Corp of Engineers before depositing any dredge or fill material into the Arroyo Seco wetlands or waters? Will wetlands restoration be required and if so, how does the City propose to comply?

**Additional analysis required:** This analysis of the massive resculpting of the basin is inadequate. How can the destruction of a large consolidated mature habitat, where least Bell's vireo has been observed, with less mature fragmented habit (landscaping around active recreation areas) be considered adequate mitigation?

#### 6. Table 2.3.1.18.2-3 – Southern Willow Scrub

**Additional analysis required:** The MEIR fails to evaluate the impact on wildlife and vegetative habitat of the destruction of the 17.8 acres of existing dense area of willows in the basin. It is where the siting of (possible migrating) least Bell's Vireo was observed in 8/93. Least Bell's vireos are known to nest in this type of habitat. "*The least Bell's vireo, (Vireo bellii pusillus), is a federally listed endangered species sensitive to changes in riparian vegetation.*"

**Additional information needed:** The table incorrectly states, "*habitat lost due to inundation (water conservation)*" Better to state, "*habitat will be destroyed through the grading of 312,000 cubic yards of grading to construct a conservation pool.*"<sup>9</sup>

#### 7. Negative Impacts on Habitat Related to Bicycle Use

Cyclists wandering off either by accident or intent of a designated trail has high potential for disturbing and endangering habitat.

**Additional analysis required:** The MEIR is deficient for not having commented on this possibility. This factor has not been considered in the MEIR.

#### 8. LAMP Sections 2.3.4.2.3. – Improved Lighting

Calls for improved lighting – quantity is not defined. The Lower Arroyo is closed at sunset, so lighting that is obtrusive and disturbing to residents along the Arroyo is not necessary. Impacts on wildlife need to be assessed.

**Additional analysis required:** What will be the effect of proposed lighting on nocturnal animals, particularly considering the Arroyo as a wildlife corridor?

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<sup>9</sup> MEIR Table 2.3.1.18.2-3, Southern Willow Scrub, line below SUBTOTAL

## 9. Misleading Table Regarding Loss of Habitat

The following table is very misleading compared with Figure 3.3.4.1.2-1 (*Proposed Terrestrial Natural Plant Communities at Hahamongna Watershed Park Master Plan Area*.) Primarily, it conceals the increased developed areas within natural sounding habitat areas to imply a *no net loss* of habitat, when in fact; there is significant loss of quality-consolidated habitat. It is also clear that the City is calling areas where there is active recreation, that has been re-landscaped with less dense vegetation interspersed with active recreation areas, as habitat. Also the table below notes a 4.5 acre loss of Southern Willow Scrub, when in fact, the grading plan will destroy most of the existing habitat (17+ acres) to create the Conservation pool. Additionally, the area descriptions appear to confuse the matter further. The table shows a combined 5.9 loss of developed areas (*Developed and Developed and Landscaped*) even when there will be a approximately 6.9 acres of active recreation (present Oak Grove Field, approximately 2.4 acres, and the additional three new additional athletic fields, approximately 4.5 acres. This total does not include the disc golf, children’s play areas, proposed fishing lakes, parking lots, etc.

**Table from Arroyo Seco Master Plan-Hahamongna Watershed Park-page 3-20**

<i>Area Description</i>	<i>Existing Acres</i>	<i>Proposed Acres</i>	<i>Change</i>
OW Coast Live Oak Woodland	26.2	30.8	+ 4.6
W Southern Willow Scrub	25.5	21.0	-4.5
SS Sage Scrub	39.9	42.6	+2.7
RAFSS Riversidean Alluvial Fan Sage Scrub	17.2	18.8	+1.6
MF Mule Fat Scrub	19.5	11.0	-8.5
SSRW Southern Sycamore Riparian Woodland	2.6	21.2	+18.6
R Ruderal	75.4	0.0	-75.4
SBR Streambed Riparian	8.1	8.3	+ .2
A Aquatic	0.0	5.0	+5
WT Wetland	0.0	2.8	+2.8
WA Water Conservation Pool	0.0	54.4	+54
L Landscaped	5.8	9.6	+3.8
D Developed	60.0	56.8	-3.8
D & L Developed and Landscaped areas not shown within a plant community polygon (such as a trail, dirt road, picnic & camping site, disc golf fairways and pole climbing area)	10.6	8.5	-2.1
<b>TOTAL PARK ACREAGE</b>	<b>290.8</b>	<b>290.8</b>	<b>-0.4</b>

**Additional information needed:** What is meant by the terms Aquatic, Streambed Riparian & Wetland; Landscaped & Developed? Under what categories are the athletic fields, disc golf, lakes, children’s play areas, parking areas, spreading basins classified in the table?

**Additional analysis required:** The MEIR is deficient because it does not admit or clarify that there will be a substantial loss of existing high quality habitat.

### 10. Section 2.3.1.3.3. Johnson Field access road widening

Describes the need to widen the Johnson Field Road to 24 ft. A few years ago the City received grant money to plant Engelmann Oak and Sycamore trees along the verge of this road. The trees are now well established and beginning to develop their own habitat niche in the area. The presence of the trees has allowed substory vegetation to thicken.

**Additional analysis required:** The MEIR is deficient because the impact on the trees is not mentioned in the project description. No mitigation is planned. How is this road going to affect these endangered trees? The Tree Ordinance in the Pasadena General Plan forbids the removal of Engelmann Oaks.

**Additional analysis required:** CPAS disagrees with the MEIR when it states that the “Johnson Field access road widening,” “the development of a sophisticated operating procedure...,” as well as many other items in the bulleted list will not have significant impact on the environment and the existing natural habitat. The widening of the road will impact these trees. The Engelmann Oak, once common in the San Gabriel Valley, is now an endangered tree. The Johnson Field road cannot be widened to 24 ft without exposing these trees to damage from passing vehicles, compaction or removal to make way for tarmac.

### 11. Playing fields in Hahamongna

The MEIR states that “use of new playing fields in Hahamongna would be expected to create a new source of light” (MEIR, Section 3.1.4.1.1). This is a violation of the Design Guidelines, which state unequivocally: “**Permanent or temporary lights are not allowed on multi-purpose fields.**” (Design Guidelines, Section 5.2.1-9). The HWP MP states that exterior lighting will be limited to that “for security, safety and operational purposes only so as to not impact nocturnal wildlife” (HWP MP, Section 1.5, Goal 1, Objective 1.7).

**Additional information needed:** The MEIR (3.3.4.1.2) is deficient in not evaluating the effect of human activity and night lighting on the nocturnal wildlife in an acknowledged wildlife corridor. How have the impacts of night play on fields been evaluated as to the possible detrimental effect on HWP MP habitat restoration goals?

**Additional information needed:** What commitment will the city make to maintain all the soccer fields and other irrigated landscapes? There has been an inability to maintain the irrigated landscapes in the past, so how will the city be able to maintain irrigated lands in the future with such a dramatic increase? How will this be impacted by potential future droughts or restrictions? How much water is needed? Who will supply it?

**Additional analysis required:** Impacts on government services for provision of maintenance, etc must be included.

**Additional analysis required:** What impact will the pesticides needed to maintain all of the soccer fields have on run-off? What clean-up or collection systems will be put in place to clean the run-off and comply with local, state and federal clean water standards? Will run off negatively impact the river when it is restored? Where is this adequately addressed in the MEIR?

**Additional information needed:** The MEIR is deficient in that it does not adequately evaluate the impacts of the installation and ongoing maintenance required for athletic fields and the related support facilities. What else is planned in conjunction with the soccer fields, i.e. buildings, power lines, water lines, bathrooms and sewage facilities, paved roads and parking lots, etc. that could potentially disrupt the balance of nature and wildlife? Why is so much parking required around the playing fields? Is the city planning to install seating and other structural amenities?

The MEIR states that converting three areas in Hahamongna to playing fields would not impact recreation because “these are not currently used for recreational purposes” (MEIR, p. 3.11-5). At least one of these three areas is now used for Frisbee golf.

**Additional analysis required:** This analysis also fails to take into account the recreational and restorative value of open space and shows a bias in the MEIR toward active recreational uses such as sports fields.

#### **12. Section 2.3.1.11.1. – New Parking Structure Would Affect Habitat**

Although it is one of the largest projects listed in the HWP MP, the project description for the proposed parking structure is exceedingly brief.

**Additional analysis required:** A parking structure in a natural habitat area would have significant impacts in the areas of aesthetics, air quality (increased vehicle pollutants), biological resources (Arroyo Toad), geology, noise (car alarms), public services (security) and traffic (Oak Grove Dr.).

**Additional analysis required:** The MEIR states that there may be a significant impact in many of these areas but the impacts are severely understated. The MEIR also lacks descriptions of mitigating measures for many of the significant impact areas. The inadequacy of this project description and evaluation requires a revised MEIR.

#### **13. Section 2.3.1.1.1 – HWP Parking Areas Would Destroy Habitat**

The proposed area for a new 10,000 sq. ft. lot for 12 vehicles, plus other elements would destroy existing habitat for the sake of parking.

**Additional analysis required:** The MEIR fails to establish the need for the new parking facilities or to evaluate the destruction hillside and related habitat.

**Suggested alternative:** CPAS suggests that a walkway from road level to the overlook existing area currently accessed through the tunnel might be constructed which would allow foot traffic from the dam to cross under Oak Grove Drive. Persons wishing to park near this overlook could park on Linda Vista or Oak Grove Drive.

## VII. Comments on Cultural Resources

In discussing cultural resources, the MEIR almost completely ignores the natural Arroyo. The MEIR concentrates on such things as archeological and prehistoric considerations and the impact upon them during construction of the new facilities and widening of access roads, while ignoring the cultural effects of loss of natural space in the Arroyo.

### 1. Goal of the ASMP inconsistent with City's Comprehensive General Plan and Land Use Ordinance

**The goal of the proposed ASMP** is stated: *“to provide facilities for passive and active recreation that support Policy 9.2 of the City's Comprehensive General Plan in order to provide recreation facilities and programs to meet the diverse needs of City residents and visitors”*. The City of Pasadena's Arroyo Seco Public Lands Ordinance [Ord. 6403 §2 (part), 1990] (§3.32.020) requires the Arroyo Seco *“be preserved, protected and properly maintained.”*

**Additional analysis required:** The goals of preservation, protection and maintenance must be included and therefore subject to environmental review. The **spirit and goals** of the Guiding Principles of the City of Pasadena's General Plan and Objectives and Policies of the Land Use Element set forth in Appendix B, are missing from the goal(s) of the ASMP. The MEIR fails to adequately consider the impacts of this missing component. Preservation of Pasadena's historic character and environment and preservation of open space is of prime importance to its citizens and must be a focus for the ASMP.

**Suggested alternative goal should include reference to :** Policy 9.5 of the General Plan which is to: *“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.”*

### 2. ASMP Adherence to the City of Pasadena's Goals, Objectives, and Guidelines

After looking forward for so many years to the release of the ASMP and MEIR, citizens have expressed disappointment that it fails to conform to the City's Comprehensive General Plan (“GP”), the Plan's Guiding Principles (“Principles”), the Arroyo Seco Public Lands Ordinance (“Ordinance”), and the US Secretary of Interior Standards for the Lower Arroyo Seco (“Standards”).

The objective of the Arroyo Seco Master plan is to provide facilities that support Policy 9.2 of the City of Pasadena's General Plan which seeks to plan and implement a plan for the Arroyo: *“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 plan goes on to state that achieving restoration and conservation of the natural environment is one of the objectives. (ASMP ES-2).

The City of Pasadena's Arroyo Seco Public Lands Ordinance [Ord. 6403 § 2 (part), 1990] (§3.32.020) requires the Arroyo Seco “*be preserved, protected and properly maintained.*”

There are also seven guiding principles, which the City of Pasadena has published as the values to be used for future development. Many of these guiding principles focus on preservation and acquisition of open space (Guiding Principal 1, objective 2, Guiding Principal 5, policy 21.4). Other guiding principles ensure the development of our city in accordance with its historic character and environment (Guiding Principal 2). Other guiding principles try to shape the mobility of our city by encouraging open spaces within walking distances (Guiding Principal 5).

In 1979, the Lower Arroyo Seco was added to the city of Pasadena's Designated Landmark's and Treasures as a Cultural Heritage Landmark. The city has declared that cultural heritage landmarks shall conform to the US Secretary of the Interior Standards for the Treatment of Historic Properties (“Standards”). These Standards were developed to help protect our nation's irreplaceable cultural resources by promoting consistent preservation practices. A baseline of the lower arroyo has yet to be developed.

CPAS has reviewed proposed elements in the ASMP against the GP, Principles, Ordinance and Standards in an attempt to quantify compliance with the goals, objectives and guidelines inherent in these documents.

The data in the following pages of this section support the fact that, overall, the ASMP project fails to meet any of these preservation standards. 35% of the elements within the CAMP were found to focus on restoration and preservation. 24% of the elements within the LAMP will result in restoration. The HWP MP had only 29% of the elements planned for restoration. These numbers quantify the inability of the ASMP to achieve the guiding principles, goals, and stated objectives that the City of Pasadena has presented.

**Additional analysis required:** The goals of preservation, protection and maintenance must be included and therefore subject to environmental review. The **spirit and goals** of the Guiding Principles of the City of Pasadena's Land Use Element which are missing from the goal(s) of the ASMP must be insured. The MEIR fails to adequately consider the impacts of this missing component. Please explain all elements in each of the following charts in which there is noted a failure to adhere to City goals, standards, policies and etc.

**Suggested alternative goal should include reference to :** Policy 9.5 of the GP which is to: “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.”

Preservation of Pasadena’s historic character and environment and preservation of open space is of prime importance to its citizens and must be a focus for the ASMP and MEIR.

### **Legend for Compliance Tables**

- Stds** = Conforms to US Secretary of Interior Standards
- Obj 9** = Obj 9 – Preserve the Arroyo Seco
- P9.2** = Policy 9.2 - Plan for the arroyo, including restoration of the natural area of the lower arroyo
- GP1** = General Plan Guiding Principle #1 – Land Use Element – Objective 2 - Preserve open space in targeted development areas and residential areas of the City in order to enhance the quality of Pasadena life.
- GP2** = General Plan Guiding Principle #2 – Harmonize change to preserve Pasadena's historic character & environment
- GP5** = General Plan Guiding Principle #5 – Circulate without cars
- 21.4** = General Plan Guiding Principle #5 – Land Use Element Policy #21.4: Incorporate open space and parks into the development as open space amenities

**Overall Adherence to City Goals, Objectives and Guidelines By Region –  
Central, Lower and Hahamongna**

Goal, Obj, Guideline	CAMP Adherence	CAMP Non-adherence	LAMP Adherence	LAMP Non-adherence	HAMP Adherence	HAMP Non-adherence
Conform to US Secretary Interior Standards for treatment of historic properties	NA	NA	27%	54%	NA	NA
Objective 9 -Identifies the Arroyo Seco for preservation	32%	14%	27%	51%	34%	51%
Policy 9.2 -[plan & implement] plans for the Arroyo...	100%	0%	25%	56%	100%	0%
Guiding principle 1 – Obj 2 – Preserve & acquire open space in targeted development areas. to enhance quality of Pasadena life.	50%	4%	19%	54%	32%	56%
Guiding principle 2 – Change will be hamonized to preserve Pasadena's historic character & environment	43%	7%	24%	52%	36%	33%
Guiding principle 5 – Pasadena will be a City where people can circulate without cars	21%	0%	22%	17%	8%	26%
Guiding principle 5–Policy 21.4 - Where a park, natural open space exists adjacent to or near transit-oriented development, these features should be incorporated into the development as open space amenities	57%	0%	33%	27%	33%	48%
<b>Total Adherence</b>	<b>35%</b>	<b>21%</b>	<b>24%</b>	<b>47%</b>	<b>29%</b>	<b>43%</b>

## CAMP Adherence to Pasadena Guidelines

Component	Obj 9	P9.2	GP1	GP2	GP5	21.4
Brookside Picnic area changes	NA	Y	Y	NA	NA	Y
Resurface pathway from Holly Street Bridge	Depends on resurface	Y	NA	Depends on resurface	Y	Y
Restore entries, pathways, & arroyo stone walls	Y	Y	Y	Y	Y	Y
Restore amphitheater	Y	Y	Y	Y	NA	Y
Widen main pathway to allow easier patrol of hillside	N	Y	N	N	N	N
Restore Arbor, stone BBQ area, & the rockery	Y	Y	Y	Y	NA	Y
Restore bandstand & seating	Y	Y	Y	Y	NA	Y
Develop new children's play area	NA	Y	Y	NA	NA	Y
Reorient sports field for soccer	NA	Y	Y	NA	NA	NA
Replace colonnade area with turf	N	Y	Y	N	NA	NA
Rosemont Pavilion	NA	Y	NA	NA	NA	NA
Widen & separate pedestrian path	NA	Y	NA	NA	Y	Y
Provide additional rest areas	NA	Y	NA	NA	Y	Y
Reallocate eastside hiking & horse trails to west side	NA	Y	NA	Y	NA	NA
Construct trail on west side of Rosemont	is there currently a trail?	Y	N	Y	Y	Y
Remove impediments & improve signage for equestrians	NA	Y	NA	NA	NA	NA
Locate pedestrian pathway -Salvia Canyon, Rosemont, Seco St, Parkview	NA	Y	N	NA	Y	Y

## CAMP Adherence to Pasadena Guidelines

Component	Obj 9	P9.2	GP1	GP2	GP5	21.4
Enhance slopes w/ plants	NA	Y	Y	Y	NA	Y
Identify areas for native plant restoration	Y	Y	Y	Y	NA	Y
Plant 100 trees	Y	Y	Y	Y	NA	Y
Improve & minimize signage	NA	Y	NA	NA	NA	NA
Improve existing landscaping in parking areas	Y	Y	Y	Y	NA	NA
Improve & increase multi-turf areas	N	Y	N	N	NA	NA
Covered channel w/ low flow thru golf course, parking lots	N	Y	N	N	NA	NA
Natural streams where feasible	Y	Y	Y	Y	NA	Y
Acquire additional land to add to Central Arroyo	Y	Y	Y	Y	NA	Y
Accessibility & security	NA	Y	NA	NA	NA	NA
New entrance to Rose Bowl	NA	Y	NA	NA	NA	NA

## LAMP Adherence to Pasadena Guidelines

Component	Stds	Obj 9	P9.2	GP1	GP2	GP5	21.4
Add main entry gate w/signage	NA	N	N	N	N	N	NA
Add new natural landscaping	Y	Y	Y	N	Y	NA	Y
Add new lighting	N	N	N	N	N	NA	N
Increase road width to main parking area	N	N	N	N	N	N	N
Grade, resurface & install new crib wall (concrete)	N	N	N	N	N	N	N
Remove scrub & stabilize slope	NA	Y	Y	N	N	N	Y
Widen entrance, add lighting & gate at San Pasqual, gates may emulate La Casita	N	N	N	N	N	N	N
Add new landscaping	Y	Y	Y	N	Y	NA	Y
Add one acre of parking	N	N	N	N	N	N	N
Add new restroom facilities	N	N	N	N	N	Y	N
Add drinking fountains, kiosks, & interpretative area	N	N	N	N	N	NA	N
Picnic area	N	NA	NA	N	NA	NA	N
Designated equestrian path w/ water troughs	Y	Y	Y	NA	Y	Y	N
Improve Lower Arroyo for bicyclists & small maintenance vehicles	N	N	N	N	N	N	N
Modify east side iron gate	NA	N	N	NA	NA	NA	NA
Modify east side access w/ timber, concrete, & stone	N	N	N	N	N	Y	NA
Restore La Casita stone wall	Y	Y	Y	Y	Y	NA	Y

## LAMP Adherence to Pasadena Guidelines

Component	Stds	Obj 9	P9.2	GP1	GP2	GP5	21.4
Plantings around La Casita	Y	Y	Y	Y	Y	NA	Y
Signage & information kiosk at La Casita	N	N	N	NA	N	NA	N
Restore bird sanctuary	Y	Y	Y	Y	Y	Y	Y
Curb cuts @ Arroyo Blvd for increased access adding prohibitive signage	N	N	N	N	N	Y	NA
Slope stabilization along Arroyo Blvd rim trail	NA	Y	Y	NA	NA	NA	Y
Remove irrigation & exotic vegetation along Arroyo Blvd rim trail	N	N	N	N	N	NA	NA
Resurface casting pond	Y	Y	Y	Y	Y	NA	Y
Replace asphalt decking with concrete or other	NA	NA	NA	N	N	NA	N
Restroom upgrade, brush clearance	NA	NA	NA	N	NA	NA	NA
ADA trail & restrooms at archery	N	N	N	N	N	NA	NA
Increase the archery bldg, add storage & bathrooms, add sewage line	N	N	N	N	N	NA	NA
Informational kiosk at clubhouse (archery?)	N	N	N	N	N	NA	N
Picnic tables & controlled parking for six cars	N	N	N	N	N	NA	N
10' wide swinging gate to only allow access to archery or other events	N	N	N	N	N	NA	N

## LAMP Adherence to Pasadena Guidelines

Component	Stds	Obj 9	P9.2	GP1	GP2	GP5	21.4
Improve safety of archery area	NA	NA	NA	NA	NA	NA	NA
Improve archery path for ADA	N	N	N	N	N	NA	NA
Upgrade drinking fountains	NA	NA	NA	NA	NA	NA	NA
Add new all weather surfaced 10' bikeway from San Pasqual to Parker Mayberry bridge	N	N	N	N	N	NA	NA
Add new all weather surfaced trail at La Loma bridge and near camel hump	N	N	N	N	N	N	Y
Horse prohibited on west side south of La Loma	N	N	N	NA	NA	N	N
All equestrian use on the west side	N	N	N	NA	NA	NA	NA
Bike path on both east and west side	N	N	N	N	N	Y	Y
Improve existing Westside trails	Y	N	N	N	N	Y	Y
Add signage, rest areas, native plantings & maybe ADA	N	NA	N	N	NA	NA	NA
Improve existing trails by Archer's clubhouse & south of, resurface trails w/ decomposed granite, add signage	Y	N	N	N	N	Y	Y
Increase path for ADA and small maintenance vehicle	N	N	N	N	N	N	N
Realign bicycle trail at La Loma	N	N	N	N	N	NA	NA
At La Loma, native plantings, habitat restoration, remove brush	Y	Y	Y	Y	Y	NA	NA

## LAMP Adherence to Pasadena Guidelines

Component	Stds	Obj 9	P9.2	GP1	GP2	GP5	21.4
Add picnic tables, boulders, decomposed granite	N	N	N	N	N	NA	NA
Minimal grading	N	N	N	N	N	NA	NA
San Rafael trails improved to 4' wide in ADA standards, boulders, native plantings	N	N	N	N	N	NA	NA
Handrails will be installed at existing footbridge for bicycles	N	N	N	N	N	NA	NA
Improve eastside trails south of La Loma	Y	Y	N	N	N	Y	Y
Add decomposed granite, increase width to 14', ADA where feasible	N	NA	N	N	N	N	NA
Repair irrigation, add signage & boulders, brush clearance	NA	NA	NA	NA	NA	NA	Y
Expand trail at camel's hump, add signage	N	N	N	N	N	Y	Y
Improve trail at camel's hump, add habitat enhancement area & native plantings	Y	Y	Y	Y	Y	Y	Y
Perform camel's hump stability study	NA	NA	NA	NA	NA	NA	NA
Construct new foot bridge between La Loma & San Rafael 12' wide w' handicap & maintenance truck access	N	N	N	N	N	NA	N
Neighborhood trail access will be restored, native plantings, replace dead trees, map	Y	Y	Y	Y	Y	NA	Y

## LAMP Adherence to Pasadena Guidelines

Component	Stds	Obj 9	P9.2	GP1	GP2	GP5	21.4
Memorial Grove - restore low flow stream, add vegetation	Y	Y	Y	Y	Y	NA	Y
Restore habitat, allow for reduced maintenance	Y	Y	Y	Y	Y	NA	Y
Repair irrigation, modify trails around streams, add boulders and picnic tables	NA	NA	NA	Y	Y	Y	Y
Remove restroom	NA	NA	NA	NA	NA	NA	NA
4.6.1 no project avoid significant impacts	Y	Y	Y	Y	Y	Y	Y
4.6.2 no project - avoid significant impact on critical habitat	Y	Y	Y	Y	Y	Y	Y

## HWP Adherence to Pasadena Guidelines

Component	Obj 9	P9.2	GP1	GP2	GP5	21.4
New parking lot for 12	N	Y	N	N	N	N
ADA trails to lower area @ devil's gate	N	Y	N	NA	Y	Y
Install gate, upgrade to iron safety fence, add landscape	N	Y	N	N	NA	N
Add new entry slip lane to access dam, parking for 3	N	Y	N	N	N	N
Raise existing road bed to meet slip lane	N	Y	N	N	N	N
Add exit road	N	Y	N	N	N	N
Restore curb and landscape berm access from La Canada. Modify fencing & drains	NA	Y	NA	NA	NA	NA
Demolish dam keepers quarters, replace w/ restroom, w/ 2nd story dam keepers quarters	N	Y	NA	NA	NA	NA
Enhance deck safety w/ fencing	N	Y	N	NA	NA	NA
Add sign, lighting, kiosk, landscaping @ entry, Oak Grove Blvd & Foothill	N	Y	N	N	N	N
Add access lane to enter park from Oak Grove	N	Y	N	NA	N	N
Relocate entrance to Windsor Street, widen road, add retaining wall	N	Y	N	NA	N	N
Add native landscaping	Y	Y		Y	NA	Y
Widen Johnson Field Road, add turn around, add loop & parking for 12 and one bus	N	Y	N	N	N	N

## HWP Adherence to Pasadena Guidelines

Component	Obj 9	P9.2	GP1	GP2	GP5	21.4
Move 621 acre feet of sediment from dam to create overflow pool & conservation pool	N	Y	N	NA	NA	N
Install pump & infrastructure	NA	Y	NA	NA	NA	NA
Storm drain modification – pollution treatment(4.3)	NA	Y	NA	NA	NA	NA
Create 3 new basins - 22 surface acres at 6"	N	Y	N	NA	NA	N
Expand basins to the east @ JPL & relocate city's sludge basins to the north - will occupy 75% of existing JPL parking lot	N	Y	N	NA	NA	N
Shorten Altadena drain, restore riparian habitat	Y	Y	Y	Y	NA	NA
Excavate 243 acre-feet spillway (area under elevation of 1040.5) and place above the spillway	N	Y	N	NA	NA	NA
Remove 1400 acre feet of sediment below spillway	N	Y	N	NA	NA	NA
Remove 3000 cubic yards of sediment at sluice gate	N	Y	N	NA	NA	NA
Shape the basin to influence sediment deposit	N	Y	N	NA	NA	NA
Construct haul road to remove sediment	N	Y	N	N	NA	N
Add 4-6 picnic tables @ Oak Grove w/ shade structures, grade & surface w/ decomposed granite	Y	Y	Y	Y	NA	Y

## HWP Adherence to Pasadena Guidelines

Component	Obj 9	P9.2	GP1	GP2	GP5	21.4
Add electricity, water trash disposal area	N	Y	N	N	NA	N
Add shelters, tables on Westside, ADA access	N	Y	N	Y	NA	N
Replace old restroom w/ new restroom w/ lighting	NA	Y	NA	NA	NA	NA
Improve drainage for run-off	Y	Y	Y	NA	NA	NA
Restore amphitheater fine grade, & make ADA accessible	Y	Y	Y	Y	NA	Y
Fill & build 2 acre multipurpose field for soccer, play & picnics @ Sycamore Grove	N	Y	N	N	NA	N
Add new restroom w/ storage, ADA accessible, add phone & lighting	N	Y	N	NA	NA	N
Fill existing willow stands to 1046 ft & relocate disc golf, restore habitat	N	Y	N	N	NA	N
Double parking area, for 220 ADA 9 spaces, 2 busses, add turnaround & extend access road	N	Y	N	N	N	N
Establish plant nursery	NA	Y	NA	Y	NA	NA
Add 2 supervised camping areas for organized groups, inc fire rings, outdoor amphitheater, shade areas, restrooms,	N	Y	N	N	NA	N
Parking for overnight campers & busses and trash bins will be provided. No hitching post	N	Y	N	N	N	N

## HWP Adherence to Pasadena Guidelines

Component	Obj 9	P9.2	GP1	GP2	GP5	21.4
Convert maint bldg to ranger station	NA	Y	N	NA	NA	NA
Install liner & create stream environment, ADA access	Y	Y	Y	Y	NA	Y
Restore existing restroom, ADA, add parking for 20 & overnight campers, 3 busses, add trash	N	Y	N	N	N	N
Remove 94,2000 ft <sup>3</sup> of earth & establish new 4.8 acre lake [2.7 acre for kids, .3 acres for wildlife]	N	Y	N	N	NA	N
Equestrian area, upgrade restroom , make ADA	NA	Y	NA	NA	Y	NA
Widen road to 24', raise 4', add 60' drain new 14' one-way road, parking for 10 trailers or busses	N	Y	N	NA	N	N
Sunrise overlook - clear vegetation, plant oak woodland, provide granite seating, make ADA accessible	Y	Y	Y	Y	Y	Y
Construct 1,200 parking structure w/6 stories for recreational users	N	Y	N	N	N	N
Convert old park road for busses, emergency vehicle & bike use. Add trash enclosure	N	Y	N	NA	N	N
Add masonry trash enclosure for horse waste	N	Y	N	NA	NA	N
Upgrade & raise w/ imported fill Johnson Field for soccer & softball	N	Y	N	N	NA	N

## HWP Adherence to Pasadena Guidelines

Component	Obj 9	P9.2	GP1	GP2	GP5	21.4
Raise land 10' to add soccer field no. of Johnson Field, add 12 picnic tables	N	Y	N	N	NA	N
Add restroom, ADA, emergency phone	N	Y	N	NA	NA	N
Add 54 picnic tables making two ADA accessible, hitching posts, watering troughs	Y	Y	N	N	NA	Y
Add lined water play area and boulders	Y	Y	Y	Y	NA	Y
Pave dirt shoulder for parking for 200 & 2 busses	N	Y	N	N	N	N
Create 2.5 acre interpretative area & picnic area, add parking for 2 busses, 10 cars. Make ADA accessible trails, add 4 picnic tables	N	Y	N	NA	N	N
East Lake -- develop new lined fishing lake w/ island for wildlife & new multipurpose field	Y	Y	Y	Y	NA	Y
Add raised overlooks & walkways	N	Y	N	N	NA	N
Create sunset overlook, brush clearance, picnic tables -4	Y	Y	Y	Y	N	Y
Add interpretive signage, parking for 1 bus or 4 cars	N	Y	N	NA	N	N
Add new trailhead from JPL w/ new restroom, picnic tables, parking for 200, signage	N	Y	N	N	N	N
Add new restroom at north lot, ADA, public telephone	N	Y	N	NA	NA	N

## HWP Adherence to Pasadena Guidelines

Component	Obj 9	P9.2	GP1	GP2	GP5	21.4
Create new trail at 4.5' above spillway elevation, 12-16' wide	Y	Y	N	Y	N	Y
Finish grading and access for emergency & maint vehicles	N	Y	N	N	N	N
Create bridge at Flint Wash crossing (prefab metal)	N	Y	N	N	N	N
Fill & elevate trails and disc golf areas 15'	N	Y	N	N	NA	N
Create north bridge crossing (prefab metal) access for emergency & maint vehicle, hikers & horses	N	Y	N	N	NA	N
Add new trail at East Rim	Y	Y	Y	Y	Y	Y
Add 4 new trail connections 4' wide for horses and hikers	Y	Y	Y	Y	Y	Y
Reroute 400' of trail to separate from vehicle traffic	N	Y	N	N	N	N
Replace existing stairs at west rim trails	Y	Y	Y	Y	NA	NA
Add trail loop for dam observation	Y	Y	Y	Y	Y	Y
Add paved bicycling trail along west side of new JPL parking structure	N	Y	N	N	Y	N
Restore & expand alluvial fan sage scrub habitat	Y	Y	Y	Y	NA	Y
Establish habitat at Spreading basin	Y	Y	Y	Y	NA	Y
Widen stream channel	Y	Y	Y	Y	NA	Y

## HWP Adherence to Pasadena Guidelines

Component	Obj 9	P9.2	GP1	GP2	GP5	21.4
Establish habitat at east entrance	Y	Y	Y	Y	NA	Y
Add ADA trail and interpretive signage at east side of basin	N	Y	NA	Y	NA	Y
Add sycamore woodland south of Johnson Field	Y	Y	Y	Y	NA	Y
Add 26.2 acres of coast live scrub oak	Y	Y	Y	Y	NA	Y
Add 3.6 areas of Oak Woodland restoration	Y	Y	Y	Y	NA	Y
Restore 7.7 acres of southern willow scrub	Y	Y	Y	Y	NA	Y
Restore & add 42.6 acres of sage scrub	Y	Y	Y	Y	NA	Y
Restore & add 17.2 acres of Riversidean fan sage scrub	Y	Y	Y	Y	NA	Y
Restore 10.3 acres of fan mule scrub	Y	Y	Y	Y	NA	Y
Restore 2.6 acres of southern sycamore riparian woodland habitat	Y	Y	Y	Y	NA	Y
Replace 75.4 acres in ruderal species with other plant communities, grade & create undisturbed habitat for toad	Y	Y	Y	Y	NA	Y
Restore & add 8.3 acres of streambed riparian habitat	Y	Y	Y	Y	NA	Y
Relocate SCE & Pasadena wires & bury Pasadena wires	NA	Y	Y	Y	NA	NA

## VIII. Comments on Hydrology

### 1. Section 2.3.1.3. water conservation. 2.3.1.4 Pump-Back System

The MEIR is deficient because it fails to evaluate the impact of the proposed pump-back system in HWP on the environment. Descriptions of the linear footage for the pump back system are detailed and its location is described, but there is no discussion of the impacts the installation of this system will have on the environment.

**Additional information needed:** When is installation planned? What time of year will installation take place? How will the pipeline installation be coordinated with the widening of the Johnson Field road, the construction of the Johnson Field parking lot and the construction of the perimeter trail? What is the anticipated cumulative impact of these development projects on the basin ecosystem? How is the Pump-back system going to be funded? What is the estimated cost? What kind of maintenance will be required on the pipeline? What kind of voltage is required? What are the projected running costs of this system? What are the annual maintenance costs for the pipeline? What permits will be required to complete this project? element

**Additional analysis required:** All of these factors need to be understood before they can be evaluated for environmental impact. The MEIR is inadequate in the subject of water conservation.

### 2. Section 2.3.1.4.2. Westside Spreading Basins

This section states that the City has the right to divert a maximum of 25 cubic feet of water per second from the Arroyo Seco stream. In the HWP MP there is discussion of this right.

**Additional information needed:** Many questions need to be addressed:

- This right is not adequately discussed, as to how it was established, etc. Please clarify.
- There is no discussion regarding the downstream water rights. How do other entities utilize water released from Devil's Gate Dam?
- What stream flow is required to fill all the spreading basins within the Park Plan and how long will it take to fill all the basins with normal water flow?
- How often is there sufficient rainfall to fill these basins and maintain streamflow?
- What responsibility does the City have to maintain streamflow?
- If the streamflow is below 25 cfs what percentage does the City have to allow to flow downstream?
- Downstream of the diversion is Riversidean alluvial fan sage scrub. How will the City's diversion plan impact this endangered plant community, which requires stream flow to survive?

### 3. Section 2.3.1.4.5. Eastside Spreading Basins

**Additional information needed:** Clarification is required on the statement: *“Opportunities for spreading water would be enhanced through the expansion of existing and creation of new basins in the area now occupied by the JPL east parking lot. Testing has shown the rate of percolation of water into the Raymond Basin is greater in this area than in the existing basins.”* The statement reads as if the parking lot has greater hydrolic conductivity than the spreading basins. When will this project be completed? What time of year will this project be completed? What is the maintenance schedule for these basins? It is unclear from the park plan if these basins will be graded according to landform grading principles. This should be clarified. If landform grading principles are employed, how will the sixty foot bank described in Exhibit 3-5 of the HWP MP impact the spreadable area?

**Additional analysis required:** Where is the discussion in the MEIR or the HWP MP of the cumulative impact of implementing the expansion of the spreading basins along with other projects in the park?

### 4. Section 2.3.1.4.2. Flood Management

The removal of all habitat below the 1030msl as part of the flood management program will degrade and destroy high quality habitat. This area is currently the site of a mixture of willow and ruderal habitat and wetlands. The willows close to the stream channel are relatively mature. The habitat in this part of the basin has sufficient contiguity to provide small pockets of “interior” habitat [as described by the Institute for Urban Wildlife]. These core areas are used by key species that make up the ecology of the basin, particularly coyotes and bob cats. The willow on the westside of the park is used as roosting habitat by Cooper’s hawks and barn owls. This whole area is scheduled for destruction in the HWP MP.

The habitat plan proposed in the park plan is confined to small isolated areas that will fail to support viable wildlife populations. The removal of these core habitat areas may endanger the survival of resident species in the park. In the case of the barn owl and the Cooper’s hawk this will be a “take” of protected species.

**Additional analysis required:** The MEIR is deficient because there is no discussion in this section of what this 69 acre segment of the basin will be like during the dry months of the year. The plan is to remove all emerging vegetation. The area will become worthless for wildlife purposes and has the potential to cause dust problems during the summer and fall.

### 5. Section 2.3.1.8 West Lake – Permanent Pond

A permanent pond is an unnatural feature in the Arroyo Seco. Water costs are discussed in the HWP MP, but construction and other maintenance costs are not. This section uses a term “habitat interpretation”.

**Additional information needed:** What does “habitat interpretation” mean? Please clarify. How will human access be discouraged on the protected areas of the lake? How often is there enough water to fill all the percolation ponds and supply the lake? How will domestic water for the lake be aerated? Mechanically, naturally? Please be specific. Why does the City consider these feature as being preservative or protective of the Arroyo Seco?

**Additional analysis required:** Impacts cannot be considered with incomplete information. Impacts must be considered and analyzed against the river restoration that the majority of citizen’s desire.

## IX. Comments on Noise

### 1. Noise Methodology, Data and Significance Flawed

A review of the noise analysis contained in the MEIR for the HWP MP indicates that the methodology, data, and significance conclusions are flawed for the following reasons:

- The baseline data is inaccurate as the ambient noise measurements used for “existing conditions” for the HWP were taken approximately three miles from the area proposed for the most intensive development (1010 Armada Drive).
- Ambient noise measurements at 1010 Armada Drive (63 dBA) indicate that the noise levels are already in violation of the City of Pasadena’s noise standard, the County of Los Angeles’ Noise Ordinance, and the significance thresholds established in Section 3.9.3 of the MEIR.
- The noise analysis does not take into account the “amphitheatre” effect of the arroyo that, ostensibly, heightens the intensity of any noise made in the base of the arroyo.
- The MEIR’s established threshold of an increase in CNEL as 5 or more as significant is excessive, and exceeds general industry standards for CEQA documents (generally an increase in excess of 3 CNEL is considered significant).
- The noise impacts are not calculated correctly as each project element is assessed individually and does not take into account site conditions.
- The noise section does not address cumulative noise impacts.

**Additional analysis required:** The noise analysis used ambient noise measurements from 1010 Armada Drive (63 dBA) as the representative ambient noise level in Hahamongna Watershed Park. This location is approximately 3 miles from the area slated for intensive development and is therefore, not an appropriate standard for this analysis. Despite its distance from the Hahamongna Watershed Park site, this measurement is also questionable as the ambient noise measurement of 63 dBA already exceeds the City of Pasadena’s noise standard of 50 dBA during daytime hours and 40 dBA for nighttime hours for single-family residential areas. This noise level also exceeds the County of Los Angeles’ noise standards of 50 dBA for daytime hours and 45 dBA for nighttime hours. Moreover, the significance thresholds established in Section 3.9.3 of the MEIR states: “If noise levels from the project exceed the allowable levels under the City of Pasadena Noise Ordinance or if the project results in a substantial increase in existing ambient noise levels, then a significant environmental impact would occur.”

**Additional information needed:** How can the MEIR arrive at a significance conclusion of no significant impacts if the ambient noise measurements already exceed the City of Pasadena’s noise ordinance without the project?

## 2. Table 3.9.3-1 of the MEIR

Table 3.9.3-1 establishes a significance threshold of “adverse” if the local CNEL increases by 3 to 5 dBA. The discussion in Section 3.9.4.1.2.1 states that the expanded Oak Grove parking area would increase noise levels by 3 dB, but fails to state that this is an adverse impact, despite the significance thresholds established in the previous section.

**Additional analysis required:** The MEIR is inadequate because it does not address a series of specific and cumulative effects. The noise generated from each proposed parking lot is evaluated separately and there is no discussion of cumulative impacts. For example, the discussion on the new parking area for the supervised overnight camping areas reads as follows: “Noise levels from vehicle door slams should be less than ambient levels at distances in excess of 100 feet. For the limited number of parking spaces that would be provided, noise levels at the edge of the park would not exceed the threshold for significance.” First, stating that the noise levels will be less than current ambient levels is dependent on knowing what the ambient levels are; ambient noise measurements were not taken in this area. Second, stating that there would be a “limited number of parking spaces” clearly illustrates that the noise produced by each parking lot was evaluated separately and no broader view of cumulative impacts was assessed. This should be appropriately reviewed and impacts properly stated for adequacy of the MEIR.

**Additional information needed:** The project is proposing approximately 2,337 new parking spaces in this general vicinity. If just one of these parking lots increases the CNEL levels by 3dB, what is the potential impact of 2,337 parking spaces, including a multi-story parking garage?

**Additional analysis required:** The method used for assessing noise levels at distances from the noise source is unreliable in this particular locale. The topography of the arroyo creates an amphitheatre effect. Sound travels up, towards the residences located on the east and west rims of the arroyo. Given this fact, a simple equation of reducing the decibel level of a noise as it travels across a certain distance (as used in the MEIR), without accounting for intervening topography, is inaccurate and misleading.

**Additional analysis required:** The noise analysis for Hahamongna Watershed Park must be repeated using accurate and current noise data and noise modeling technology. Furthermore, the significance conclusions must correspond to the significance thresholds established in the MEIR. The MEIR must properly evaluate the cumulative impact of the multiple noise-producing project elements proposed for the HWP MP.

### 3. LAMP Noise Levels Not Measured Properly

The environmental impact study for the LAMP was completed entirely by analysis of an acoustical engineer. There were never any actual ambient noise levels measured for this part of the Arroyo. In fact, the only ambient noise levels measured for the entire Arroyo were located at 1010 Armanda Dr. (East Side) and the East end of Charles St (West Side). The Lower Arroyo is significantly more quiet, in terms of average ambient noise levels (as measured by the Community Noise Equivalent Level or CNEL), than the rest of the Arroyo.

**Additional analysis required:** While CNEL Significance Thresholds are only guidelines (as they have not been formally adopted by the City of Pasadena), it states that a new noise source of a 5 dB CNEL increase, and in some cases 3dB-5dB CNEL increase would have a Significant Impact.

### 4. Ambient Noise Measurements

Page 3.9-8 of the MEIR states: “If a given area is characterized by a quiet noise environment and a new noise source is introduced that increases the noise exposure in the area without violating the City’s Noise Ordinance, then a noise impact might occur....It is generally accepted that most people will consider an increase in existing CNEL ambient level of 5dB or more as noticeable. Therefore, a CNEL increase of 5dB or more is generally considered to be a significant environmental impact”. Additionally, on pg 3.9-8 under Operational Noise it states: “*A significant impact would result if operation of the project, including traffic-generated noise, creates a substantial permanent increase in ambient noise levels. Even though increases in CNEL values of 3 to 5 dBA are generally not considered to be significant noise impacts, if there is a category change in the Land Use Compatibility Guidelines, the overall impact would be considered to be significant*”.

**Additional analysis required:** Without actual ambient noise measurements in areas of increased traffic, such as the new South Entrance where there is an estimated increase in traffic of 200 daily trips (as a result of the new parking lot), and the Roving Archers entrance at Norwood Drive where there is an estimated increase in traffic of 60 daily trips, the MEIR cannot accurately assess the true noise impacts, especially since this area is a quiet noise environment. These tests must be performed and the impacts documented.

### 5. Noise Impacts from Emergency Vehicles Not Assessed

If the designs of the bike path, new bridge, and widening of the roadways are to accommodate emergency and maintenance city vehicles, then there will be some use of them (that is not occurring now) and will result in some change in ambient noise.

**Additional analysis required:** New features to a natural area must be adequately evaluated for increased ambient noise levels. This evaluation must be performed.

## **6. Noise Impacts from Bicycles and Picnic Areas in the Lower Arroyo Not Assessed**

Bicycles, especially in packs, will generate additional noise. The bicycles in close proximity to dogs will create undesirable dog barking. Addition of picnic facilities in an especially quiet part of the Lower Arroyo on the Westside and south of the La Loma bridge will generate additional noise. The effects are not discussed.

**Additional analysis required:** How will bicycles and additional picnic areas effect noise levels in the Lower Arroyo? What method has been used to determine this impact?

## **7. Helicopter Pad in Hahamongna Area**

If the proposed parking structure is built adjacent to JPL, it will necessitate moving the current heliport.

**Additional Information needed:** What will happen with the helicopter pad in the event that the proposed parking structure is built? Where will it go when all of the changes have been made? Have the noise impacts been considered? Will helicopter use increase? Is this discussed in the MEIR? If not, why?

## X. Comments on Transportation/Traffic and Circulation

The location of JPL and its growth over the years has impacted the surrounding areas of La Cañada and Altadena. The MEIR does not adequately evaluate the current traffic problems as well as the future problems given further expansion of the lab. The Oak Grove Drive traffic problems are also exacerbated by the La Cañada High School traffic.

**Additional information needed:** In what city or cities does JPL reside in? Has JPL formulated a parking Master Plan? Why can't the parking structure be placed completely on JPL land?

### 1. Parking Garages Effect Traffic Patterns

The MEIR states that the various parking garage alternatives considered will all "result in the same number and level of significant transportation impacts" as the proposed project (MEIR, p. 4-12 and 4-14).

**Additional information needed:** What is the impact that additional JPL employee traffic will have upon other intersections in La Cañada Flintridge, such as Foothill Boulevard and Gould Avenue or Foothill Boulevard and Angeles Crest Highway.

**Additional analysis required:** This analysis is inadequate in that it does not evaluate how traffic patterns will be altered. It must be determined how much traffic is expected to go toward La Cañada Flintridge and how much will still exit on the Altadena side of the park.

**Additional analysis required:** The MEIR is deficient in that it has no study of the effect of additional garage traffic on Foothill Boulevard and Oak Grove Drive, even though the MEIR acknowledges that over 13,400 cars travel on Oak Grove Drive each day (MEIR, p. 3.12-46).

**Additional analysis required:** Nowhere in the MEIR is there any study of whether the JPL campus streets are adequate to handle the additional cars, now parked on the east side of Hahamongna, which would be going through the campus to access the garage. The traffic study does not address the increase in traffic, which will result from the relocation of 1132 cars to the west side of the park. The traffic study concludes that none of the study intersections are anticipated to be significantly impacted by the proposed project during the weekday AM and PM peak hours (MEIR, Vol. 1, p. 3.12.-51). What is the impact of the relocated JPL traffic?

**Additional analysis required:** The MEIR does not discuss measures necessary to mitigate adverse traffic impacts upon what is already an extremely congested area at peak travel times?

**Additional analysis required:** The MEIR is inadequate because it fails to discuss air pollution mitigation measures that may be required as the result of the increased traffic on the west side of the park where there are a large number of sensitive

receptors (i.e. children) at the four schools in the immediate vicinity and the two schools nearby?

**Additional analysis required:** Why is the MEIR not in compliance with the Pasadena General Plan which requires that sensitive receptors be afforded special consideration in the evaluation of potential impacts related to air quality (MEIR, p. 3.2-7)?

**Additional analysis required:** The MEIR is also deficient in that it fails to address the significant safety concerns raised by a public access garage next to JPL after the terrorist attacks of September 11, 2001. In light of increased terrorist threats, JPL has installed new perimeter fencing and enhanced perimeter lighting, increased security patrols, cancelled its popular spring Open House, and moved its entrance checkpoint on Oak Grove Drive further away from campus buildings. Analysis should be made of impacts of a terrorist truck bomber being able to drive right up to JPL and park.

**Additional analysis required:** Pasadena is being negligent in its responsibility to park users and to neighboring communities by not addressing these safety concerns in any garage alternative built next to JPL that is to be made accessible to the public.

**Additional analysis required:** The analysis of the JPL/public access parking structure is also inadequate in the MEIR in that nowhere in the document is there any analysis of the environmental impacts which will result from the projects necessary to get park users to the garage. How is the park user to get to this new road on MWD property? If the new road is intended to come off of Oak Grove Drive close to the JPL security kiosk, why is there no discussion in the MEIR of the increased congestion this will cause on Oak Grove Drive?

**Additional analysis required:** Please assess the possibility of placing the JPL parking lot on JPL property.

## 2. Westside Park Entrance (MEIR Section 2.3.1.2)

The main entry would remain at Oak Grove Drive & Foothill Boulevard, However an access lane would be added to make entry to the park safer and more efficient. This lane would provide a one-way ingress into the west side of the park.

**Additional analysis required:** The MEIR does not provide adequate details of this project. The project will involve asphalt surfacing, removal of several trees, and the passing of vehicles near or under the drip live of several oak trees. The impacts of this project should have been evaluated in Section 3.0. There is also a concern that the slip lane will eventually provide access to new parking structures to be used for Rose Bowl offsite parking. The City must disclose any such use of this road under 14 CCR § 15144.

**Additional information required:** Apparently the city of Pasadena has already begun (or completed) construction of this “slip lane” in order to allow La Cañada high school students to be dropped off and picked up in the area. The project was part of

the MEIR, but has now been segregated and addressed as a stand-alone project. Is the City preparing an EIR on this project? It is also a violation of CEQA to segregate a large project into smaller parts in order to avoid environmental review. What traffic and environmental analysis have been done in order to justify the segregation and completion of the project without proper review? What other justification does the city have for this early project completion?

### 3. New Eastside Park Entrance (MEIR Section 2.3.1.3.1)

A new park entrance would be relocated to the intersection of Windsor Avenue and Mountain View Street. The new entrance would require a new retaining wall to the west of the current entrance/intersection. The road leading down the slope from the eastside entrance would be realigned to east of the arroyo Well and follow the easterly edge of the current JPL parking lot. The project will also widen the existing eastside roadway leading to Johnson Field and provide a turnaround for buses and emergency vehicles.

**Additional information required:** More information is needed on the size of the retaining wall, the exact positioning of the wall, the amount of scrub sage to be removed and the stabilization of the slope area and the impact on wildlife. This area has been a nursery site for resident species of wildlife in the park and the removal of the habitat will make it impossible for wildlife to remain in the area. The aesthetic impact of the retaining wall, denuded slope and the expanded roadway must be evaluated.

**Additional analysis required:** The realignment of the access road (Section 2.3.1.3.2) behind the Arroyo Well will involve the removal of scrub sage habitat from the area around the well. What permits will be required to complete this project. This area is home to one of the few remaining coveys of quail, which are considered by CEQA to be “resident species”.

**Additional analysis required:** Inadequacies in project description and illustration make it impossible to determine the impacts of the road realignment. How much of the current road would be used? Would the old road be abandoned? How much grading would be required to pass east of the Arroyo well? How massive would the retaining wall be? The MEIR is deficient for not adequately describing the proposed road relocation and failing to evaluate its impacts, such as slope destabilization, habitat destruction, water quality impacts from increased erosion, and destruction of wildlife habitat and corridors.

**Additional analysis required:** If the Johnson Field road is widened to 24 feet, Engelmann Oak and Sycamore trees along the road will be impacted. Additional analysis should be done to determine the impact of the widened road on these trees. Mitigation measures should be proposed.

#### 4. **Realign and Widen Access Road to Equestrian Staging Area (MEIR Section 2.3.1.9.2)**

**Additional analysis required:** The MEIR fails to adequately evaluate the impact of the road widening on the oak woodland park atmosphere and the increased large vehicle traffic to this remote area of the park. Given that the existing road has already encroached on the Oak Woodland, any increase in capacity would further endanger the existing oaks.

#### 5. **West Arroyo Inner Park Access to Hahamongna Watershed Park (MEIR Section 2.3.1.11.2)**

The City wishes to use the old park road that bisects the MWD property for both vehicle and bicycle access to the proposed 1,200 space parking structure.

**Additional information required:** This road is not described in detail, it is believed that the roadway will be 24 feet wide and will be paved. The roadway will be located on MWD land that is currently leased to the Rose Bowl Riders. The impact on this equestrian club is not acknowledged nor addressed in the MEIR although it represents a change in land use. At a minimum the environmental impacts of grading, removal of trees, disruption to current land use, noise, pollution and traffic should have been addressed in the MEIR.

**Additional analysis required:** The City recently gave “Notice of Intent to Adopt a Negative Declaration” for the MWD property lease. Since this property and its’ use are part of the MEIR here under discussion, it would be improper for the City to adopt this “Negative Declaration.” The project description submitted by the City, states that “No physical changes to the site are proposed at this time” and that “the project will not result in potential significant impacts on the physical environment.” These statements contradict the HWP MP and MEIR. 14 CCR §15144 states that an agency must disclose all projects for that land that can reasonably be forecast at the time of adoption.

#### 6. **Paved Bike Path in Hahamongna (MEIR Section 2.3.1.17)**

Bicycles would be allowed to travel on any existing or proposed paved surface within the park. The proposed path follows the perimeter of Hahamongna on existing vehicle roads and the route will use existing roadway, but portions will require grading and paving in areas that are currently natural.

**Additional analysis required:** The MEIR does not address the environmental impact of the grading and paving for this route, including sensitive plant community communities and affected wetlands, streamzones and resident and migratory wildlife. Paving will of necessity extend into flood-prone areas of high habitat value. The MEIR also does not address the potential for conflicts as the route runs adjacent to designated equestrian trails.

**Additional information required:** How will park regulations be enforced so that high-speed bike riding does not take place in areas jointly shared by hikers and horses?

**Additional information required:** What barriers will be necessary to keep cyclists on the bicycle route and prevent them from wandering off the designated path?

**Suggested Alternative:** Everything possible should be done to reduce and eliminate paving in this area. There should be no new paving of roads for bikes or for any other purpose. Speed bumps could be installed on the currently paved portions of the path, which would encourage only recreational bike use. This would create an atmosphere more in line with the other uses of the path, such as hikers and equestrians.

#### **7. Enhance Main Park Entrance to Lower Arroyo (MEIR Section 2.3.4.2)**

This project description states that this element would “*upgrade the existing entrance located near the intersection of Arroyo Boulevard and Norwood. Among the project elements are new lighting, widening the road to 24 feet to include bicycles and vehicles, and stabilization of the adjacent slope.*”

**Additional analysis required:** The width of the current road is adequate for the traffic into the Lower Arroyo. The narrow passage reduces vehicle speed and impact on this road and the surrounding hillsides. There is no need to accommodate bicycles on this roadway because they are restricted to the Westside multi-use path. Bicycles should not be permitted to travel over the Eastside, which is used by hikers, dog walkers and equestrians. The Pasadena Fire Department currently conducts training exercises with fire engines in the parking lot area and successfully utilizes the existing road. The proposed widening and lighting will change the aesthetic values of the area and interfere with the native species that inhabit the park.

**Additional analysis required:** The MEIR fails to evaluate the cumulative impact of the grading, crib structure, the slope degradation, and the habitat destruction necessitated by the widening of the road. This would alter a Pasadena Historic Landmark and violate the Arroyo Seco Ordinance, which prohibits the construction of new structures and roads.

#### **8. New South Entrance to Lower Arroyo (MEIR Section 2.3.4.3)**

The new southern entrance would provide entry to the Lower Arroyo Seco from the southern city limits completely within the Pasadena city property. The new driveway would lead to a paved access road along an already existing graded pathway 500 Feet in length.

**Additional analysis required:** The existing graded “pathway” referred to is an abandoned, unpaved path approximately 12 feet wide. In order to widen the path to 24 feet, stabilization of the uphill slope to the East of the road and downhill slope to the West will be required. The MEIR is inadequate in that stabilization of the slopes is not addressed. In any case, the width of 24 feet is excessive and should not include

access to bicycles. This is an especially critical area for equestrians as the main entrance from the San Pascual stables is in the same area. If bicycle access cannot be provided from the Westside of the stables, bicycles should not be allowed in the Lower Arroyo.

**Additional analysis required:** Additional traffic studies should be done for the proposed driveway entrance into the Southern entrance of the Lower Arroyo. The existing “pathway” accesses the street at a very awkward angle. Vehicles traveling south will come upon the driveway from the top of a hill and vehicles traveling north will approach up the same hill. Both approaches represent limited visibility making both ingress and egress dangerous. Traffic issues were not acknowledged nor mitigation measures discussed in the MEIR .

## XI. Comments on Utilities and Service Systems

### 1. Relocation of Overhead Transmission Lines

The MEIR proposes the relocation of 2,000 linear feet of overhead transmission lines to the Gabrielino Trail, relocation of a Pasadena Power and Communication line along the Gabrielino Trail, and the “raising” of a SCE transmission line located in Hahamonga Basin. The MEIR states that the aesthetic of the existing utility lines is “undesirable”. Conversely, Section 3.1.4.1.2 of the MEIR (Aesthetics) states that the relocation of these very same “undesirable” utility lines (utility improvements) is an issue that “would not be expected to degrade . . . the qualities of the site and its surroundings” and therefore, the relocation and raising of these lines has “no impact” on aesthetic resources. Section 3.1.4.1.2 further states: “Utility improvements to the Hahamongna Watershed Park are consistent with Policy 5.9 of the City of Pasadena’s General Plan [sic]”. General Plan Policy 5.9 reads as follows: “Urban design programs shall ensure that new development shall respect Pasadena’s heritage by requiring that new development respond to its context and be compatible with the traditions and character of Pasadena and shall promote orderly development that is compatible with its surrounding scale and that protects the privacy and access to light and air of surrounding properties.”

**Additional analysis required:** The relocation of the power lines, if properly done, will enhance the aesthetic, habitat and natural ambience of the Hahamongna Watershed Park. Placement of utility lines along a recreational trail is contrary to these purposes. Relocation to a trail fails to “responds to its context” and is not “compatible with its surrounding scale” as stated in Policy 5.9 of the General Plan. If the transmission lines were placed underground, a significance conclusion of “no impact” would be plausible; however, the MEIR does not obligate the City to place these lines underground.

**Additional analysis required:** A significant conclusion of no aesthetic impact is in direct conflict with descriptive statements made earlier in the document and is not supported by Policy 5.9 of the General Plan. Surely, if the power lines are undesirable, relocating an undesirable element adjacent to residents and trail users clearly constitutes an adverse aesthetic impact.

**Additional analysis required:** The construction impacts associated with the relocation of these lines are not addressed in the MEIR. CPAS requests that the aesthetic, noise and air quality impacts associated with the relocation of these power lines be properly addressed in the MEIR.

### 2. Section 2.3.1.11.3 – Equestrian Refuse Disposal Area

This 1,000 foot masonry enclosure for trash dubbed the “Equestrian Refuse Area” is inappropriately named. It actually is planned to include only one dumpster for horse manure and three dumpsters for conventional waste. The MEIR does not adequately

address the aesthetic impact of placing this 1,000 foot masonry enclosure for trash disposal directly adjacent to the West Rim Trail. A waste disposal area should not be placed next the trail exit onto one of the loveliest spots in the basin. Trail users will walk out into the basin and see the spectacular, sweeping vista of the San Gabriel Mountains on one side and the trash area on the other! The West Rim Trail is one of the two major outlets from the La Cañada Flintridge trails into the park and the Rim of the Valley trail network. The trash trucks that will empty the dumpsters would access the area via the road to be built directly adjacent to the equestrian trail.

The MEIR is deficient in that a separate area for equestrian waste in this location is unnecessary and would be a hardship upon Rose Bowl Riders, since they pick up the manure up every day, store it in covered, water-tight BFI bins, and never pile it on the ground. Tom Sawyer Camp currently uses a bin, which is not covered, but this could easily be rectified without requiring a huge costly road and a 1,000 foot waste enclosure, both of which would degrade valuable parkland.

**Additional information needed:** What was the purpose of this design? Did City staff visit the area and consider the impact of the dumpsters on aesthetics, noise and access? What is the justification for locating a separate area for equestrian waste in this location? How would the equestrian waste be transported from the equestrian facilities to the proposed dumpster?

**Additional analysis required:** The MEIR is deficient in not addressing the impact upon recreation of placing this trash disposal area next to a major trail. Large, loud trash trucks banging huge dumpsters next to the trail will be dangerous to the equestrians as well as a significant intrusion upon the serenity and enjoyment of the other trail users as well. There should be a discussion of these impacts and means to mitigate them in the MEIR.

All conventional waste would need to be “trucked” to the area as well. Waste management trucks would need to drive into the area regularly to remove all refuse. The construction and the daily use of the refuse area would have potentially significant environmental impact in the areas of aesthetics, air quality, biological resources, hazardous materials, noise, and traffic.

**Additional analysis required:** The MEIR only evaluates the refuse area under aesthetics, resulting in an inadequacy in the evaluation of this project. And, like public use of the proposed parking structure, the refuse area is dependent on a roadway that is not addressed in the MEIR.

**Recommended alternative:** Place a trash disposal area in a secluded area of the park such as the former maintenance yard on the MWD property which the City proposes to lease. This would also preclude the need for an additional road on the MWD property.

## XII. Comments on Parking Structures and Lots

### General

#### 1. Quantification of Current Parking Spaces Absent

The MEIR fails to clearly state how many parking spaces are currently available in the Hahamongna Watershed Park and the Lower Arroyo and how many spaces there will be if the plan is fully implemented.

**Additional information needed:** What is the number of existing parking spaces within Hahamongna Watershed Park? What will be the total number of parking spaces if the plan is fully implemented?

#### 2. Need for New Parking Spaces in Question

There is a huge increase in parking proposed throughout the Arroyo. In Hahamongna, there could be over **2,800** parking spaces. The parking breakdown in Hahamongna is as follows:

##### West side:

Garage –	1,200 or 1,700 spaces (MEIR, p. 2-19 and 3.1.4.1.1)
Staging area –	20 (MEIR, 2.3.1.9)
Oak Grove Field –	220 (MEIR, 2.3.1.6.10)
Overnight camping area –	20 (MEIR, 2.3.1.7.4)
Dam parking area	12 (MEIR, 2.3.1.1.1)
Upper Oak Grove area	51 ( <b>existing spaces not included in the MEIR</b> )
U.S. Forest Service area	67 (on MWD land which Pasadena is trying to lease – <b>existing spaces not included in MEIR calculations</b> )

**Additional analysis required:** (The MEIR is deficient in that it does not mention the almost 120 existing parking spaces which should be included in the total when considering the environmental impacts of parking lots upon the natural environment in Hahamongna.)

##### East side:

Johnson Field	202 (MEIR, 2.3.1.12.6)
Interpretive Area	12 (MEIR, 2.3.1.12.7)
Sunset Overlook	4 (MEIR, 2.3.1.14)
Former JPL parking lot	200 (in HWP, p. 3-56) or 600 (MEIR, 2.3.1.15.1)

**Additional analysis required:** One of the most significant inadequacies of the MEIR is its failure to answer the question of why the park users of Hahamongna need 2,800 parking spaces. The uses discussed in the MEIR, hiking, soccer, Frisbee golf, horseback riding, picnicking, etc., will not require even a fraction of this amount of parking. Why does the public need to use the west side parking lot next to JPL even

if the parking garage is not built on this site? There will be almost 400 parking spaces on the west side already. Is the supposed need to access this parking lot merely another justification to build an unnecessary, expensive road which will have major detrimental effects upon the recreational qualities of the northwest corner of the park? There is no discussion or analysis in the MEIR to justify the need to make the west side JPL parking lot available to the public.

**Additional analysis required:** Why would the northeast area of the park need up to 600 parking spaces? This lot will be far from the recreational features of the park. If these spaces are for the Gabrielino Trail, this trail is already overused way beyond its capacity, especially by huge numbers of mountain bikers. This is due to just the 50 or so spaces that now exist at the Windsor Ventura parking lot.

**Additional analysis required:** If these parking spaces are going to be used for purposes other than recreational Hahamongna park uses, **it is the City's responsibility as the Lead Agency to disclose this fact (14 CCR §15144)**. The adjoining homeowners in Altadena cannot adequately evaluate the cumulative environmental impacts of these parking spaces without knowing what the City intends to use them for.

**Additional analysis required:** With the exception of a 20 space parking lot in the Overnight Camping area, asphalt paving is specified for all parking lots in Hahamongna. Why are permeable surfaces not being considered for parking lots in a watershed park, one of the goals of which is to conserve and protect the water resources of the Arroyo Seco (HWP MP, p. ES-6)? Why not have more grass parking lots which can serve other uses when not used for parking as well as being more aesthetically appealing?

**Additional analysis required:** Is the asphalt parking being proposed in Hahamongna because “lease commitments with UCLA and other entities require guaranteed ‘all-weather’ parking for their events.” (CAMP, Section 2.14, Parking)? Are the asphalt parking lots and the public access parking garage in Hahamongna intended to help meet the following goal of the CAMP: “Consistent with the marketing needs of the Rose Bowl stadium, continue to minimize on-site event parking by encouraging use of designated off-site parking with a viable, efficient shuttle system.” (CAMP, Section 4.6, Parking).

**Additional analysis required:** The MEIR states that all these new and expanded parking lots will include safety lights, introducing a new source of light to the area (MEIR, 3.1.4.1.1). Why does the MEIR not include an evaluation of the impact this additional lighting will have upon the restored habitats within the basin? Why, in any case, do the parking lots require lighting when **Hahamongna Park is supposed to only be open during daylight hours?** According to the Design Guidelines, “there is no lighting recommended within the natural areas of the Arroyo Seco. The Arroyo Seco is a wildlife corridor and nocturnal wildlife is disrupted by lights. The natural areas of the Arroyo Seco (primarily the Lower Arroyo and Hahamongna Watershed

Park) close at sunset per the Pasadena Municipal Code” (Design Guidelines, Section 11.2.2). Is this another instance of the MEIR introducing elements which were not included in the HWP MP? Will the parking lots in Hahamongna require lights because they are intended to be used for Rose Bowl offsite parking and other events outside of Hahamongna park use?

## **Hahamongna Parking Issues**

### **1. Section 2.3.1.11.1 JPL Parking Structure**

The MEIR calls for moving 1,132 cars which are now parked on the east side of Hahamongna to a six-story parking structure on the west side of the park “to be accessed via Oak Grove Drive and the JPL campus”. This garage will be built on the existing west parking lot next to JPL. Most of this lot is included within the Los Angeles County Flood Control easement (HWP MP, Exhibit 2-5 Water Elevations).

**Additional analysis required:** It is impossible to comment on such a brief project description. The construction of a six-story parking lot has many impacts on the ecology and use of the basin. There is no indication of where the money is going to come from for this project.

**Additional information needed:** Why does the City propose to build a multi-million dollar parking structure within the Flood Control easement?

In several places the new **JPL parking structure** described in the MEIR/ASMP states the structure will house 1,200 or 1,700 vehicles. In another place the documents it states that the old JPL East Lot will be reduced to 75 or 600 spaces. Neither document contains any information about the total number of the total number parking spaces on or off campus needed by JPL. No mention is made JPL’s efforts to mitigate the number of employee vehicles parking at the lab.

**Additional information needed:** Currently the City receives \$450,000 per year for the lease of the two parking lots in Hahamongna to JPL “which is used for the planning, maintenance, and operations of Hahamongna Watershed Park” (HWP MP, p. 2-42). How much income will be needed each year to pay off the cost of the garage? If the income from JPL is not adequate to pay for the garage, how will the difference be made up? The MEIR does not even mention how the maintenance costs of the garage are going to be paid for. Will the garage be rented out for other uses?

**Additional analysis required:** How can the public and city decision makers adequately understand the environmental impacts of the garage(s) upon the park unless they know the types of additional uses for which the garage(s) will be used? The MEIR is deficient in the lack of specificity in its use of the term “park user” and its failure to address the real reasons why public access is proposed for the JPL parking garage in Hahamongna.

**Additional information needed:** Is one of the intended uses of the structure for Rose Bowl event spectators? Is the parking structure to be used exclusively by JPL? Can it be built on JPL land?

**Additional analysis required:** The impacts need to be evaluated at both the project level and the cumulative affects level. The potential Rose Bowl use and all other uses need to be openly disclosed in the ASMP and fully evaluated in the MEIR.

**Additional analysis required:** If the garage is used for night parking, what kind of impact will this have upon the nocturnal creatures in the park's restored habitats? What kind of light pollution will occur from these uses? According to the MEIR comments submitted by the Santa Monica Mountains Conservancy, the adult Arroyo Southwestern Toad is primarily nocturnal and areas designated as critical habitat for the toad must not be impacted by new light sources. The proposed parking garage is within the designated critical habitat area.

**Additional analysis required:** What kind of impacts will runoff from the garage have upon water quality in the basin and upon the restored habitats in the basin? In terms of human impacts, what kind of noise pollution will the neighbors in La Cañada Flintridge and Altadena be subjected to?

**Additional analysis required:** What kinds of additional traffic impacts will there be upon already congested streets?

**Additional analysis required:** These questions clearly apply to all the garage alternatives considered in the plan, whether the garage is built on the east or the west side of the park, as well as the alternative parking garage location on the MWD property which has been discussed even though it is not included in the HWPMP nor evaluated in the MEIR. In terms of the latter, if all the garage alternatives in the HWP MP are rejected, is the plan to bring the parking structure on the MWD property up for consideration at a later date? Is there also another parking garage alternative under consideration which would be built on JPL property?

**Additional analysis required:** If the MEIR is to comply with CEQA, all parking garage alternatives must be considered in the ongoing MEIR and not segmented out for later review.

## 2. JPL East Lot

The construction of the **JPL East Lot** was originally done as a temporary arrangement to ease JPL's parking problems.

**Additional information needed:** What was the basis for the City agreeing to establish a temporary lot on the NE part of Hahamongna? Did the City establish a date for it's eventual removal? Is a written document/agreement available for public viewing?

### 3. Section 2.3.1.2.1 – Park Entrance at Foothill

USFS has abandoned their facilities in Hahamongna Watershed Park.

**Additional information needed:** Why is lighting necessary at the entrance that has adjacent street lighting when the park hours are from sunrise to sunset?

### 4. Section 2.3.1.6.10 – Expanded Parking Area

**Additional information needed:** Statement is so general that it is not possible to determine the environmental impact based on the phrase “*via the improved access road to this lot.*” Will the road be widened? What surface will be used? Is it possible to surface all roads/trails on the floor of the basin with decomposed granite?

**Additional analysis required:** The document states, “*A total of 61,000 square feet of asphalt would be used*” Why is it necessary to pave the lot with asphalt, when other parking areas in the arroyo use more permeable surfaces such as decomposed granite?

### 5. Section 2.3.1.11.1 – West Arroyo Parking

Construct Parking Structure, Phase Out East Lot.

**Additional analysis required:** The MEIR fails to adequately evaluate the impact of routing an additional 1,200 vehicles to the west side access to JPL. Oak Grove Drive is already having serious traffic problems. CPAS recommends that NO structure be built that has Westside access, either on park roads or city streets.

### 6. Section 2.3.1.12.6 – Parking improvements

**Additional analysis required:** The MEIR fails to adequately evaluate of using asphalt vs. permeable surfaces such as decomposed granite. CPAS proposes that all roads/trails on the basin floor be of stable permeable materials.

### 7. Section 2.3.1.12.7 – Interpretive Area & Parking

**Additional analysis required:** The MEIR fails to specify the exact location and whether it will impact the existing oaks and the newly planted trees (Englemann oaks, sycamores on the Johnson Field Road.

**Additional analysis required:** The MEIR fails to adequately address the impact of the potential traffic congestion to this area. What is the basis for providing 2 bus spaces for this area?

### 8. Section 2.3.1.15.1 – Convert JPL Parking to Public Parking

**Additional analysis required:** The 600 vehicle capacity might be an error, since it leaves over half of the existing spaces. If it is not an error, how was the need establish that 600 places are needed for public parking? Will this “public parking” become off-site parking for City events?

## Lower Arroyo Parking Issues

### 1. Section 2.3.4.8.5., 2.3.4.8.1., 3.1.4.3.2: Archery Clubhouse parking and additions

The proposed parking area will be paved and striped and will look like an established parking lot which is incompatible with the definition of a natural preservation area.

**Additional information needed:** The nature of the materials for the parking area surface are not sufficiently described. The existing area under discussion is being used for temporary parking on the natural surface when supplies are unloaded and reloaded for special archery events such as tournaments. There is no justification given for adding a more formalized parking lot.

**Additional analysis required:** The environmental impacts of additional runoff from “hardscape” has not been addressed. The impacts on a natural preservation area have not been evaluated.

### 2. Section 2.3.4.3.1 – 20 Parking Spaces (at South Entrance of Lower Arroyo)

**Additional information needed:** On what basis was the need for this project established? What are the supporting facts demonstrating need for a parking lot which will have an adverse effect on the environment?

**Additional analysis required:** Currently the dirt area is accessed by and used for parking by park visitors who access it through the stables (City of South Pasadena’s lease holder) with an existing agreement with the City of South Pasadena. The MEIR fails to adequately assess the impact of this parking area.

### XIII. Comments on Cumulative Impacts

#### 1. Department of Fish and Game Request for Analysis Relative to Off-Site Habitats

Section 15130. The Department of Fish and Game stated in paragraph 2.b. of their ASMP Initial Study response that: “*Project impacts should be analyzed relative to their effects on off-site habitats and populations. Specifically this should include nearby public lands, open space, adjacent natural habitats and riparian ecosystems*”.

**Additional analysis required:** This request has been ignored. The analysis must be performed.

In paragraph 2.c. the DFG state: “*A cumulative effects analysis should be developed under CEQA Guidelines 15130*”.

**Additional analysis required:** This request has been ignored. The analysis must be performed and reviewed in a public forum.

#### 2. Army Corps of Engineers not Consulted on Wetlands and Water Quality

The MEIR does not address the impacts of moving earth and debris for the parking and extensive grading of the Arroyo Seco.

**Additional analysis required:** Determine if a permit is needed from the Army Corp of Engineers, whether there will be wetlands destruction and, if wetlands mitigation is required, how the City proposes to mitigate.

#### 3. Cumulative Impacts on Resident and Migratory Wildlife Species

The MEIR contains no discussion of “cumulative impacts” as required under CEQA. The impact of all the projects planned for HWP MP could have a cumulatively detrimental impact on resident and migratory wildlife species in the basin as well as the flora and fauna.

**Additional analysis required:** An analysis of cumulative impacts must be performed.

The habitat analysis indicates that all destroyed habitat will be replaced in kind. The HWP MP uses the term “quality habitat”.

**Additional information needed:** The City needs to define the term “quality habitat”.

The sycamore woodland slated for the south side of Johnson field requires the removal of dense stands of mulefat scrub; these currently act as nursery sites for coyotes, rabbits and quail. The City’s general plan on page 4.8-14 of the biological resources section states: “*As development occurs in the region, barriers to the free movement of wildlife may be created, habitat areas may be lost or degraded by becoming isolated from larger blocks of habitat or subject to increased edge effects from the human population (i.e. increased recreational use and domestic cats and dogs preying on wildlife). Therefore, loss or degradation of these habitats within the*

*City, in combination with the loss of habitat due to urbanization in other parts of the region, represents a cumulatively significant impact.”*

**Additional information needed:** In its use of the term “quality habitat” the MEIR and HWP MP mention nothing about the need for sufficient contiguity of habitat to maintain viable wildlife populations. The MEIR says it will lay out the “goals” of the habitat restoration program but only lists areas of habitat improvement. It fails to mention the objectives and evaluation standards for this habitat restoration.

The word “wildlife” appears once in the discussion of habitat projects. This is in relation to the 1/3 acre island in the proposed east pond which would be “set aside for wildlife”. The habitat projects are fragmented and will provide little wildlife benefit. The expansion of the spreading basins will further fragment the basin, increasing the amount of “edge” habitat and leaving wildlife exposed to human and predator activity. There is discussion of endangered species as part of the habitat program. However, before an endangered species is likely to return to an area, conditions for other “indicator” species to thrive – coyotes, quail, raptors – must be present.

The Riversidean alluvial sage scrub habitat project is, as the Department of Fish & Game describe, - “*exploratory*”. Human attempts at alluvial sage scrub restoration meet little success. This plant community survives in the alluvial fan and requires streamflow to become established. However, the expansion of the City’s spreading basin project with the diversion of 25 cfs. of water will leave little streamflow for this plant community.

**Additional analysis required:** The Final Draft Biological Technical Report Hahamongna Watershed Park 3.0, prepared by Parsons Engineering Science, Inc. states that the sensitive alluvial sage scrub habitat may require educational signage and fencing. These measures are not included in the Master Plan or EIR, nor are they evaluated as mitigation measures.

**Additional analysis required:** The MEIR fails to analyze the negative impact on the sensitive Riversidean alluvial sage scrub habitat of such projects as the expansion of the spreading basins, sediment removal, road development, the northern bridge, maintenance of power lines and other aspects of the plan. It also does not address the importance of protecting and restoring this rare and vital habitat.

**Additional analysis required:** Under 14 CCR §15130 and the recommendations of the City’s own General Plan, the discussion of cumulative impacts is inadequate and must be addressed.

#### **4. Projects on MWD Property**

Several projects on the MWD land were discussed in the HWP MP and/or the MEIR as well as in community and committee meetings. These projects include a new road, a bike path, an interpretive center and a native plant nursery, a portion of a spreading basin, and a portion of the park perimeter road/trail. Their inclusion provides substantial evidence in the record that Pasadena does intend to develop the MWD

property despite repeated assurances in the ASMP Initial Study for the MWD Property Lease (MWD Initial Study) that Pasadena “is not proposing any physical change to the site.”

**Additional analysis required:** The cumulative impacts of the projects on the MWD property must be considered in the current MEIR. To consider these projects at a later date would be segmenting the project so as to avoid revealing to the public how pervasive the overall environmental impacts will be.

## 5. Noise from Parking Lots in Hahamongna Watershed Park

Several parking facilities are planned for the Hahamongna area and described in the HWP MP.

**Additional analysis required:** The noise generated from each proposed parking lot is evaluated separately and there is no discussion of cumulative impacts. For example, the discussion on the new parking area for the supervised overnight camping areas reads as follows: “Noise levels from vehicle door slams should be less than ambient levels at distances in excess of 100 feet. For the limited number of parking spaces that would be provided, noise levels at the edge of the park would not exceed the threshold for significance.” First, stating that the noise levels will be less than current ambient levels is dependent on knowing what the ambient levels are; ambient noise measurements were not taken in this area. Second, stating that there would be a “limited number of parking spaces” clearly illustrates that the noise produced by each parking lot was evaluated separately and no broader view of cumulative impacts was assessed. This should be appropriately reviewed and impacts properly stated for adequacy of the MEIR.

**Additional analysis required:** The noise analysis for Hahamongna Watershed Park must be repeated using accurate and current noise data and noise modeling technology and then the City must properly evaluate the cumulative impact of the multiple noise-producing project elements proposed for the HWP MP and include them in the MEIR.

## XIV. Comments on Funding Issues

### 1. Capital outlay or capital improvement

14 CCR §15176 (b) (4) states a Lead Agency shall provide: “*A capital outlay or capital improvement program, or other scheduling or implementing device that governs the submission and approval of subsequent projects, or an explanation as to why practical planning considerations render it impractical to identify any such program or scheduling or other device at the time of preparing the Master EIR.*”

**Additional analysis required:** The City provides no capital outlay or capital improvement program, and there is no pro forma budget provided for public review. How are the projects are to be financed? What is a potential schedule for project completion? Documentation is missing that provides reasons for the omission of a capital outlay or capital improvement program. It is impossible to comment effectively on the MEIR without this information. Of equal concern, no budgets or income sources are identified for required maintenance and security for the various use expansions, additional roads, picnic areas and other recreational areas. Existing maintenance on much of the Hahamongna and Lower Arroyo areas is deficient.

### 2. Cost estimates for jobs

The MEIR fails to provide (per 14 CCR §15176 (b) (4)) cost estimates for the proposed projects. The ASMP does provide a plan for sequencing the construction of the projects, but it fails to note that much of the funding will be obtained through grants and subsidies. No mention is made as to how the “big ticket” items will be funded. This lack of clarity can only result in a chaotic situation and put the city at risk financially.

Both documents state that one of the City’s goals is to “*develop new revenue sources for the City*”. No potential sources were identified.

**Additional information needed:** What are the current “*revenue sources*” for Hahamongna and how are they currently being used by the City?

**Additional information needed:** What are the potential “*revenue sources*” the City is planning on developing and how will the funds be used by the City?

**Additional information needed:** The public must see a projected budget and outline of funding sources for the Arroyo Seco ASMP, including security and maintenance (both to cover deferred maintenance and maintenance of new facilities and elements of the ASMP) in order to properly evaluate the MEIR.

### 3. Funding for restoration and conservation of the Arroyo Seco

Restoration and conservation of the Arroyo Seco should be a primary focus of the ASMP with environmental impacts clearly spelled out in the MEIR.

**Additional information needed:** What is the nature and extent of the funding currently allocated to restoration conservation for the Arroyo Seco?

**Additional information needed:** Is that funding dedicated or is it part of the general fund? Can such funds, including Proposition A and any other available grants, be used for other purposes, especially restoration and preservation?

**Recommended alternative:** If the City has no funds that are to be used specifically for restoration and conservation of the Arroyo, we suggest that it allocate such funds immediately and explain to the citizens the reasoning behind the amount allocated and why it cannot be used for other purposes.

**Additional information needed:** To the extent revenue is generated from any of the proposed project, will such revenue be spent to preserve, protect, restore and maintain the Arroyo Seco?

#### 4. Use of funds under the National Environmental Policy Act (“NEPA”)

There is discussion in the MEIR about the possible use of funds under NEPA as a source of project funding. NEPA has strict statements on environmental justice. It provides for communities to have “meaningful involvement” in environmental projects where:

- *“Potentially affected community residents have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;*
- *The public’s contribution can influence the regulatory agency’s decision;*
- *The concerns of all participants involved will be considered in the decision making process;*
- *The decision makers seek out and facilitate the involvement of those potentially affected.”*

**Additional information needed:** For the City to seek funds under NEPA they must satisfy the Act’s requirements for community involvement. The City received a request from the Native American Heritage Commission on 9/22/00 that they contact the Commission for a list of “appropriate Native American contacts for consultation concerning the project site and assist in mitigation measures”. There is no indication in the MEIR that this has been done. Why has the City failed to contact the Native American Heritage Commission?

**Additional analysis required:** Conflicting and incompatible goals have resulted in poor discussion of projects and their impacts. The failure to provide a capital forecast makes it hard to know whether projects defined in the ASMP are even viable. The only documentation to discuss cost and be concerned about cost is the recommendation from Philip Williams Associates. The projects the City is planning to adopt have no price tag attached to them. The public has no means to determine

the net present value of this development as the City has failed to discuss funding streams and revenue sources.

**Recommended alternative:** Adopt a “No Project” alternative for the HWP MP until:

1. All projects within the park are adequately described as required by 14 CCR §15124.
2. A list of permits required for each project is listed as required by 14 CCR §15124.
3. An executive summary is prepared listing all areas of controversy known to the lead agent under 14 CCR §15121.
4. The cumulative impacts of the different projects is discussed per the City’s general plan – quoted above – the request from the Department of Fish and Game and 14 CCR §15130.
5. The City conducts population density surveys of resident wildlife species in the basin and determines the cumulative impact of the projects on this population.
6. The City mitigates against the potential “take” of protected and resident raptors as part of the HWP MP.
7. A full capital outlay or capital improvement program along with a pro forma budget is presented and the public allowed adequate time to review, comment and question as provided for under 14 CCR §15124.
8. The MEIR fully assesses the environmental impact of introducing a NFL Football franchise to the Rose Bowl, the physical modifications planned for accommodating the NFL needs and their effect on the historic nature of the Rose Bowl stadium. If changes are to be made to the Rose Bowl structure, how will these be mitigated to return the Rose Bowl to its historic nature if the NFL franchise vacates or RBOC vacates their contract?
9. The City provides detailed procedures for the completion of the projects. Which projects will require additional environmental documentation – negative declaration, MEIR or focused MEIR – and which projects the City feels it has described adequately to complete with no further public input.
10. The Negative Declaration for the lease of the MWD land is brought into the Arroyo Seco MEIR as a project and the public is given opportunity to question the intent of this project.
11. The City complies with its stipulation in *Bowles vs. Pasadena* and, along with public input:
  - Addresses the issue of permissible events in the basin.
  - Addresses the public perception that the City is not restoring the park “to its natural state”.

- Actively consults with the Department of Fish and Game, the U.S. Fish and Wildlife Service and the Army Corp of Engineers to mitigate against impacts to resident and migratory wildlife in the basin.
  - Presents the Philip Williams Associates recommendations as an alternative project and allows time for public review and discussion of its recommendations under 14 CCR §15126.6
  - The HWP MP is reflective of the goals of a “park” as defined by Proposition A.
  - The City fulfills the requirement of NEPA’s environmental justice clause and actively consults with the local community on the outcome of the park plan.
  - The City acknowledges the local community as a stakeholder in the MEIR/EIR process and commits, in writing, to engage the local community in a consultative role.

## **XV. Comments on Hahamongna Watershed Park and HWP MP**

The parking structure proposed in the HWP MP is the most ambitious construction project in the ASMP. The ASMP does not provide enough detailed information about this project to adequately assess its environmental impacts, since the impacts to its habitat, noise, traffic circulation and hydrology, to name a few, have ominous potential for destroying its natural resources. The MEIR fails to adequately assess the impacts of this project and therefore cannot be used to make informed decisions about its creation. In fact, there is conflicting information in the document about the very facts of this proposal.

### **1. 14 CCR §15123 – Executive Summary for HWP MP**

The summary is provided to decision makers who may not be able to read all the documentation. Under this section the summary fails to state:

- Each significant effect and proposed mitigation within the Plan.
- Areas of controversy known to the Lead Agency including issues raised by agencies and the public.
- Issues remaining to be resolved.

### **2. Public Comment on ASMP Initial Study and HWP MP**

In October 2000, the Hahamongna Watchdog Group (Group) submitted extensive comment on the ASMP Initial Study and the HWP MP. At the same time, the Arroyo Seco Foundation also submitted their comments on the ASMP Initial Study, as did numerous other organizations and individuals. None of these comments were ever acknowledged, nor were any of the recommendations adopted in the HWP MP. Most comments on the ASMP Initial Study were ignored including the requests of the Department of Fish and Game and the Native American Heritage Commission. The Group's response to the ASMP Initial Study complied with CEQA recommendations on how to comment on environmental documentation. Alternate options were supplied and the Group offered to discuss these with the Lead Agency.

**Additional analysis required:** The recommendations made in this comment are still valid and need to remain under consideration.

A review of public input on the HWP MP, recorded as part of the City's "rigorous public outreach" shows similar results. Items of community controversy have been included in the Plan and items of agreement left out. The expansion of spreading basins was never discussed at the public outreach meetings. The doubling of turf grass area is controversial – out of 17 comments on this issue in the MEIR, 6 were in favor and 11 against. Strong opinions were expressed on both sides. The turf grass expansion is in the Plan with no discussion of its controversy within the community. The restoration of the park as a natural area received 23 comments in favor and none against. Road, pipeline, turf grass, parking and spreading basin projects undermine

this unanimous opinion. The Plan creates fragmented habitat of little benefit to wildlife.

**Additional analysis required:** The elements mentioned are still valid, need to remain under consideration, and be evaluated.

### **3. Hahamongna Watershed Park as a Natural Preservation Area**

Citizens desire that Hahamongna Watershed Park and the Lower Arroyo be kept as natural and pastoral as possible. Events which draw large attendance (i.e., races, concerts, sporting events) are not in keeping with the natural setting. The Arroyo Seco Public Lands Ordinance fails to include Hahamongna in its ordinance: **Section 3.32.040** "Arroyo Seco defined: "Arroyo Seco", for the purposes of this chapter, means those lands not in private ownership lying within the area generally bounded by Devil's Gate Dam on the north, Linda Vista Avenue, San Rafael Avenue and Hillside Terrace on the west, the city limits on the south, and Arroyo Boulevard, Arroyo Terrace, Scott Place, Prospect Boulevard and Armada Drive on the east as shown on the map entitled "Lower Arroyo Park and Brookside Park, dated January 1, 1990, and on file with the city clerk. (Ord. 6403 §2 (part), 1990)." **and 3.32.050** "Sub-areas defined. Because of the wide variety of environmental situations and activities that are to be found in publicly owned portions of the Arroyo Seco, the Arroyo Seco is divided into the following 4 sub-areas or classifications: A. Natural preservation area; B. Brookside Park area; C. Rose Bowl area; D. Brookside Golf Course. (Ord. 6403 §2 (part), 1990)"

**Additional information needed:** Does the City plan to amend the Arroyo Seco Ordinance to include Hahamongna Watershed within the lands covered by the ordinance? Will the City designate Hahamongna Watershed Park as a "Natural Preservation Area" Will the City limit the size and type of events held within the Watershed Park and "Natural Preservation Areas"?

#### **4. Section 2.3.1.12.1 Renovate Johnson Field**

The renovation of Johnson Field, the creation of a new playing field and the establishment of a 200 car parking lot with bus turnaround, will have a lasting impact on the nature of the eastside of the park. This area is overlooked by a residential neighborhood. Noise analysis states that no noise can be heard from a soccer field beyond 100ft. The nearest residence is 400 feet; therefore there is "no impact". However the residences in this area are above the proposed playing field. Sound, carries freely out of the basin. Exhaust pollution from vehicles will do the same. Whistles and shouts from soccer games on the westside of the park can be heard in residences on the eastside.

**Additional analysis required:** The combination of traffic, the provision of picnic tables for around 300 people, the introduction of buses into the basin will create a significant and lasting impact. There is no discussion of this in the MEIR. The impacts are dismissed. In addition, this development fragments the surrounding habitat. It creates a barrier for wildlife on the slopes wishing to come down into the basin.

**Additional analysis required:** There is no discussion of costs and maintenance other than the \$1600 per month needed to water the grass in the turf areas of the park. There is no discussion of the establishment of any revenue stream to pay for this. If the City classifies spreading basins as “developed” land then the turf grass areas and parking lots should also be classified as “developed” rather than landscaped.

**Additional analysis required:** The original Park Plan approved by the City in 1992 planned to return Johnson field to natural habitat. There is no discussion of how the City has gone from the restoration of sage scrub to two soccer fields, a softball field, a 200 car parking lot and picnic tables for 300 people.

## 5. Turf Grass in Hahamongna Watershed Park

The HWP MP proposes the doubling of the amount of turf grass in the basin. Turf grass is unnatural to the area. In the summary of public comments contained in the HWP MP, a result of the “rigorous public outreach”, there were 17 recorded comments about an increase in turf grass. Six for and eleven against.

**Additional analysis required:** The City has failed to discuss adequate alternatives to this situation. There has been talk in the past of allowing soccer organizations to use existing school playing fields. Even if alternatives have been considered and rejected the City has an obligation under CEQA to discuss this.

**Additional analysis required:** There is no mitigation within the plan for this expansion and it stands to have a lasting environmental impact which could result in an overall change in park use.

**Additional analysis required:** Turf grass for soccer fields or other purposes will require water resources as well as fertilizers. The MEIR fails to address how fertilizer runoff which can contaminate the ground water resources be mitigated, and the effect on City water resources.

**Additional analysis required:** Oak trees in the area can be damaged by increased watering. This impact needs to be evaluated in the MEIR.

**Additional analysis required:** Under 14 CCR §15126.2(a) there is required discussion of “any significant environmental effects the project might cause by bringing development and people into the area affected”. The widening of roads in the basin, the establishment of parking facilities, restrooms, athletic fields and their attendant infrastructure stands to radically increase park usage. This is reflected in the vehicle trip analysis conducted for the MEIR.

**Additional analysis required:** However, no discussion is made about the environmental effects this will have on an open space park. No discussion is made about how an increase in park usage might affect resident or migratory wildlife species in the park.

## 6. Prior Stipulation: *Bowles vs. City of Pasadena*

In November of 1996, the City stipulated in *Bowles vs. City of Pasadena* that the HWP MP would: “describe the permissible events and projected capital improvements required to restore the area which is now within the park boundaries to its natural state...”

**Additional analysis required:** Neither the MEIR nor the HWP MP address this stipulation. Mention is made of “events” but the nature or scale of these events is not addressed. A stated objective in the MEIR is to “Provide for new revenue-generating park facilities”. There is no discussion of what kind of revenue generating activities or events will be permitted in the HWP MP. In *Laurel Heights Improvement Association vs. UC Regents* (1988) it was ruled that under CEQA the University was obligated to “provide sufficient meaningful information regarding the types of activity and environmental effects that are reasonably foreseeable...”.

The stipulation in *Bowles vs. City of Pasadena* also states: “the issue of permitting commercial bike races such as the event which was the subject of this action, will be discussed.”

**Additional analysis required:** There has been no discussion. The City has failed to meet the terms of this stipulation. The stipulation and CEQA requires the City to discuss proposed events in the basin.

The City of Pasadena also stipulated in 1996 (*Bowles vs. City of Pasadena*) that the HWP MP would be completed “in consultation with the California Department of Fish and Game and the U.S. Fish & Wildlife Service”. Neither of these agencies has been listed as consultants on the MEIR.

**Additional information needed:** In fact, requests from The Department of Fish & Game in their response to the ASMP Initial Study have been ignored.

## 7. Section 3.1.4.1.1 Hahamongna Watershed Park Impact Analysis

There appears to be an error in the last paragraph on page 3.1-6 where it states, “...would replace existing surface parking lots with a six-level parking structure capable of accommodating the existing 1,700 parking spaces.” This implies that the replacement structure will accommodate 1,700 vehicles.

**Additional analysis required:** The MEIR fails to adequately describe the impact of the 1,200 space parking structure on interior and exterior traffic in the park and surrounding communities. The report fails to consider an option where the City requests that JPL/NASA assume responsibility for building and maintaining a parking structure fully within the bounds of the JPL site. It is our understanding that JPL

developed such a plan over 15 years ago that includes such a structure. It is also our understanding that the East parking lot was only to be a temporary arrangement.

**Additional analysis required:** The MEIR fails to adequately describe the impact of the grading of 430,000 cubic yards to resculpt the basin and install an elaborate, complex and expensive infrastructure on the existing willows habitat. It appears that the current plan will virtually destroy most of the good consolidated habitat and replace it with lower quality landscaped fragmented habitat.

**Additional analysis required:** The MEIR also fails to consider less complex options for water conservation. It is clear that the current arrangement has required an extensive infrastructure to divert water into the existing spreading basins.

**Additional analysis required:** It should be noted that most spreading basins are located down-stream from dams and catchment basins. Currently, the basins are located at the mouth of the catchment basin, which requires the need for more elaborate infrastructure, which is at greater risk during major storm events.

#### **8. Analysis of Secondary Impacts Required under 14 CCR §15126.2 (c)**

**Additional analysis required:** There is no discussion in the MEIR of the “secondary impacts” of the proposed projects in the HWP MP – e.g. “highway improvement which provides access to a previously inaccessible area”. The widening of roads in the basin to allow for two lane traffic, the creation of a 200 car parking lot and bus turnaround at Johnson Field, the construction of a 1600 car parking structure with widened road on the eastside will cumulatively create a “Significant Irreversible Environmental Change” (14 CCR §15126.2 (c))

#### **9. Increase in Active Recreation Impacts Native Habitat**

**Additional analysis required:** The MEIR proposes a substantial increase in active recreation in the Arroyo Seco. These type of activities generate an increase in refuse and litter. It is well documented that a consistent refuse source substantially increases the populations of non-native birds such as ravens, crows, and cowbirds in these areas. These birds have a significant impact on native songbird populations and other sensitive species. For example, the cowbird, through nest predation, has significantly impacted the survivability of the California gnatcatcher and is primarily responsible for the placement of this species on the endangered species list. The United Fish and Wildlife Service is currently undertaking large cowbird trapping programs to try to ameliorate the affect of cowbirds on this species. The City may find themselves in the same position as the acceleration of active recreation in the Arroyo Seco will certainly result in an increase in the population of non-native bird species. The impact of these species on native population must be assessed in the MEIR.

## **XVI. Comments on Central Arroyo Seco and CAMP**

The Central Arroyo Seco, thoroughly defined in the Arroyo Seco Master Plan, has a diversity of uses, ownership, environmental circumstances and users. It is mature in its development, but the parkland portions have declined in appearance and utility from long term neglect and poor maintenance.

The vast majority of available space is already assigned for limited-access or commercial activities including the golf course and Rose Bowl, paved and unpaved parking, Kidspace Museum, Rosemont Pavilion, Rose Bowl Aquatic Center and fenced baseball fields.

Roadways, playgrounds, picnic areas, horse and hiking trails, maintained parkland and arroyo banks consume most of the remaining space. Permanent lighting, fencing and signage are prevalent throughout the improved areas or the perimeter.

The entire Central Arroyo is bisected by the concrete Los Angeles County Department of Public Works flood control channel.

Other entities besides the City of Pasadena and its lessees (mentioned above) have ownership and/or control of improvements or property within the area. These include the Metropolitan Water District, Los Angeles County and the Tournament of Roses

Key issues addressed in the CAMP are not about additional structures, improvements or major environmental impacts, as in the HWP MP and LAMP. Rather, critical CAMP issues primarily relate to safety, deferred maintenance and restoration of existing improvements, with attention to environmental and historic status.

The CAMP recommendations, responded to in the MEIR, are viewed as desirable and necessary. Many should receive a “high priority” designation, as to timing and funding, within the context of the entire Arroyo Seco Master Plan.

### **Items Omitted from the Environmental Impact Report**

**Additional analysis required:** Certain input from the public, advisory committees and standing commissions appointed by the City Council have been excluded from the CAMP without sufficient explanation or alternatives offered.

**Additional information needed:** Can the City propose projects involving other independent agencies that have sole or joint control of certain central arroyo sites or improvements (such as Los Angeles County and the Tournament of Roses)? If so, why hasn't this been done?

**Additional information needed:** Does the CEQA and MEIR process provide a formal mechanism to address issues omitted by city staff from the Arroyo Seco Master Plan (the flood control channel, and management and maintenance programs, for instance.)?

**Additional analysis required:** Any analysis of the present MEIR is an exercise in unreality. How can you discuss a car without mentioning wheels, or an airplane without its wings? Likewise, any discussion of the Arroyo Seco without recognition of, and

recommendations regarding, the flood control channel and acknowledging the cumulative impact of potential changes *currently under study* is woefully incomplete.

**Additional analysis required:** Without an evaluation of the management and maintenance programs of the CAMP, and without an analysis of budgeting and project priorities, there is no capability to review and comment on cumulative impacts, mitigation or plan alternatives.

**Additional information needed:** Please provide financial studies of certain existing situations such as a study of costs and revenue relating to use of public parkland (baseball diamonds and soccer fields) by organized activities from outside of Pasadena. Do such events consume space or time such that Pasadena's own youth are crowded out?

### **Other Issues Addressed Elsewhere in this Document**

Where applicable, we incorporate, herein, other references to the Arroyo Seco Ordinance, Design Guidelines, environmental sensitivity, historic requirements, and compliance with terms of various grants in order to obtain them.

The Rose Bowl and Brookside Golf Course, managed by the Rose Bowl Operating Company, are an integral part of the Central Arroyo. They occupy the northern two-thirds, approximately, of the area and account for a large majority of those arroyo activities that limit access to paying or pre-selected citizens.

### **Related Issues**

The installation of pedestrian pathways along Salvia Canyon Road, Seco Street from Linda Vista to West Drive and Seco Street from Rosemont to Lincoln has been approved by City Council, using funds from a RBOC bond fund set-aside (Mitigation Fund) and a recent trail grant. It is urged that these programs proceed as approved. They were the subject of numerous public hearings conducted by the RBOC, and recommended by the RBOC board of directors. Although similar projects are presented as part of the CAMP, the program approved by City Council should proceed.

In contrast, the city has permitted the installation of huge poles and attached netting on the golf course, at many locations around the recreation loop. The community believes it was not given proper notice of this project and that public participation was denied.

These poles and nets permanently altered the landscaping and aesthetics of the Arroyo, both from within and from the Arroyo edge, inserting a blight on tradition views.

**Additional analysis required:** The installation of the poles and netting should be revisited, with full public input on all appropriate impacts as proposed, as well as on an alternative project.

The section of the ASMP devoted to the Central Arroyo is very brief and omits several very important recommendations from the CAMP Advisory Committee. Project descriptions are quite short, making it difficult to determine what is included. The majority of the work is deferred maintenance rather than new initiatives.

**The major omissions of the ASMP and MEIR related to the Central Arroyo are:**

**1. Rosemont Pavilion visual improvements by painting and landscaping.**

Eventual removal of the Pavilion should be pursued with recreational use available during the six months that the Pavilion is not used by the Pasadena Tournament of Roses Association.

**Additional analysis required:** Impacts related to use of the Pavilion when it is not being used by the Pasadena Tournament of Roses Association need to be assessed.

**2. A watershed management plan that addresses the recommended changes to the flood control channel**

Current watershed studies provide a context for significant aesthetic improvement in the Arroyo while providing the required additional channel capacity due to changes to the Devil's Gate Dam spillway.

**Additional analysis required:** The MEIR is deficient in not including concepts from the Arroyo Seco Watershed Restoration Feasibility Study, a cooperative project of North East Trees and the Arroyo Seco Foundation, the most notable among these being the naturalization of the Arroyo Seco streambed and the removal of the concrete channel. This study includes a wealth of information which could be used to present a conservation/habitat restoration alternative to the infrastructure and asphalt emphasis of the current plan and alternatives as detailed in the MEIR.

**Additional information needed:** How will the City revise the CAMP in light of the findings?

**3. Deferred maintenance ignored**

During discussions by the CAMP Advisory Committee, it became apparent that a large part of the recommendations for the CAMP were deferred maintenance projects. Because of the obvious neglect of the Central Arroyo, a management and administration section was included in the recommendations.

**Additional information needed:** What provisions will be put into place to insure deferred maintenance is completed and ongoing maintenance supplied?

**4. Discussion of habitat missing in the CAMP**

There is no discussion of habitat in the CAMP. Opportunities are available to enhance and expand wildlife habitat in the Central Arroyo, particularly on the surrounding hillsides, in Brookside Park and on Brookside Golf Course. The Central Arroyo is key to connecting the Lower Arroyo to Hahamongna – an aspect which has been completely ignored in the ASMP and MEIR.

**Additional analysis required:** Impacts related to habitat must be evaluated and ways to link the Hahamongna Watershed Park to the Lower Arroyo must be found.

## 5. Long-term effects of a lengthy life-span of the CAMP

The life-span of a Master Plan can be twenty years or more, so it must be insightful – Brookside Golf Course will likely need rehabilitation including replanting, facilities remodeling, irrigation systems maintenance and renovations, re-building of greens, tees and fairways and so forth. The CAMP must address these issues and how they will conform to the overall objectives of the ASMP for achieving restoration, preservation and protection of the natural environment.

**Additional information needed and analysis required:** What measures will the City to put into place to ensure the upkeep necessary to preserve the golf course and ensure that it contributes to the natural environment rather than detracts from it?

## XVII. Comments on Rose Bowl Use Plan

The RBOC Use Plan contemplates enlarging, perhaps doubling, displacement events in the Rose Bowl (events which prevent park use by a significant number of other regular parkland users).

On August 19, 2002, the City Council approved the RBOC request to engage a consultant to bring a National Football League team to the Rose Bowl. If successful, enormous changes to the Rose Bowl will be required and eight to twelve major displacement events from August through January will be added each year for at least fifteen years.

**Additional analysis required:** This strikes an observer as an activity within the Arroyo Seco causing a huge cumulative impact on a number of CEQA-defined criteria. Yet the RBOC Use Plan component of the Arroyo Seco Master Plan is presented “in toto” on one-half of a page (ES -17).

**Additional analysis required:** Under the terms and conditions of CEQA, decisions and activities related to a project that is currently in the environmental review process can not be made. How does this factor affect the decision made by the City?

**Additional analysis required:** When does the City plan to perform an environmental review of this major component?

**Additional analysis required:** Increasing the number and type of events in the Rose Bowl will result in higher levels of air pollution (due to increased traffic) and potential increases in polluted water runoff. The cumulative effects of these impacts must be evaluated and mitigated.

As the major element in the Central Arroyo, use of the Rose Bowl requires very careful planning when considering maximum recreational use of the Central Arroyo. However, the Rose Bowl Use Plan appears as a separate section in the ASMP and after eliminating the boiler plate repeated in other sections, comprises only a single page. The MEIR discussion of this Plan also consists of a single page which **fails to describe or assess any impacts at all.**

**Additional information needed:** What additional events are planned for the Rose Bowl that are not currently occurring, such as National Football League (“NFL”) football games? Is the City of Pasadena recommending increasing the number of annual events permitted? Are there events that are being considered which are different than events held in the Rose Bowl in the past?

**Additional analysis required:** What are the additional impacts that would occur in the event that the Rose Bowl is used for professional football? How will the social and economic impacts of a NFL team effect the Arroyo Seco? What are the additional impacts that would occur for other usage that might be considered by the City? What will be the impacts related to the use of alcoholic beverages? What will be the impacts on traffic congestion if the Rose Bowl is used for NFL games? How would a contract with

the NFL impact the contract the City has with the University of California at Los Angeles (“UCLA”)?

**Additional analysis required:** What will the environmental impacts be on the historical aspects of the Rose Bowl if the City signs a contract with the NFL? Will the City insure that all changes made to the Rose Bowl if it needs to be altered for NFL use conform to the US Secretary of the Interior Standards for treatment of historic properties?

The MEIR is legally inadequate on the basis of each and all of the following reasons related to the Rose Bowl Use Plan:

- The Rose Bowl Use Plan is so vague and broad, and so incomplete, that it fails to contain accurate, consistent and sufficient specific information about the “project” to allow the public and reviewing agencies to evaluate and review its environmental impacts.

**Additional analysis required:** Please provide analysis of impacts and alternatives for the Rose Bowl Use Plan per CEQA guidelines.

- The MEIR fails to include an adequate description of the existing environment in the “vicinity” of the project from both a local and a regional perspective, including the status of the Rose Bowl as an historic resource.

**Additional information needed:** Please provide this description, per CEQA guidelines.

- The MEIR fails to evaluate inconsistencies between the proposed project and applicable planning documents, including Pasadena’s General Plan and other plans within the Master Plan which have been conceptually approved.

**Additional information needed:** Please explain inconsistencies.

- The MEIR does not identify and describe the Rose Bowl Use Plan’s significant environmental effects, including direct, indirect and long-term effects.

**Additional analysis required:** Please provide analysis of impacts and alternatives for the Rose Bowl Use Plan per CEQA guidelines.

- The MEIR does not include an analysis of significant cumulative impacts arising as a result of, or related to, the Rose Bowl Use Plan, including consideration of the Rose Bowl Use Plan in relation to all existing and anticipated projects within the Arroyo Seco Master Plan that produce related impacts.

**Additional analysis required:** Please provide analysis significant cumulative impacts arising a result of, or related to, the Rose Bowl Use Plan per CEQA guidelines.

- The MEIR fails to examine whether the project will lead to economic or population growth or will encourage development or other activities that could affect the environment.

**Additional analysis required:** Please provide analysis of economic and population growth anticipated and its environmental effects on the Rose Bowl Use Plan per CEQA guidelines.

- The MEIR fails to explain potentially significant impacts that cannot be mitigated. As to those impacts that cannot be mitigated without requiring an alternative project design, the MEIR does not describe their implications and the reason the project is being proposed despite their effects.

**Additional analysis required:** Please explain potentially significant impacts that cannot be mitigated per CEQA guidelines.

- The MEIR fails to identify and describe measures needed to reduce or avoid each potentially significant environmental effect of the project.

**Additional analysis required:** Please define measures needed to reduce or avoid each potentially significant environmental effect of the project per CEQA guidelines

- The MEIR does not describe a reasonable range of alternatives to the project that could feasibly attain the project's basic objectives, including the merits of each alternative and including, adequately, the "no project" alternative.

**Additional analysis required:** Please describe a reasonable range of alternatives to the project that could feasibly attain the project's basic objectives, including the merits of each alternative and including, adequately, the "no project" alternative per CEQA guidelines

- The MEIR fails to set forth and examine (separately from the analysis of unavoidable impacts) all significant irreversible environmental changes that would occur if the project is implemented.

**Additional analysis required:** Please examine (separately from the analysis of unavoidable impacts) all significant irreversible environmental changes that would occur if the project is implemented per CEQA guidelines.

## **XVIII. Comments on Lower Arroyo Seco and LAMP**

### **1. Section 2.3.4.4 – Provide ADA-accessible Trail**

A 60-linear foot pedestrian pathway and bridge over the east fork of the low-flow stream would be installed to allow access from the parking lot to the clubhouse and casting pond. Existing plantings would be cleared to build the bridge.

**Additional analysis required:** Although MEIR Section 3.1.3 states that there will be no significant impact with this project, the cumulative projects proposed for this area will change the environment. Additional analysis of the cumulative impacts should be made for the possibility of routing the ADA trail in another area. No justification for the bridge is offered. Access to the clubhouse and casting pond is readily available now from the parking area.

**Preferred alternative:** Locate handicapped parking closer to the access road. A new ADA accessible trail may not be necessary.

### **2. Section 2.3.4.3.1. - 20 Parking Spaces**

**Additional information needed:** On what basis was the need for this project established?

Currently the dirt area is accessed by and used by visitors who access it through the stables (by existing agreements with the City of South Pasadena's lease holder and the City of South Pasadena). Cars are currently using the existing dirt area for parking. Will the parking lot inhibit access to the trail by equestrians?

### **3. Section 2.3.4.5. – Enhance Bird Sanctuary**

**Additional information needed:** The MEIR fails to define the “enhancements” to this area. Greater specificity needs to adequately determine environmental impact.

### **4. Sections 2.3.4.6, 2.3.4.7 and 2.3.4.8 – Southern & Northern Archery Ranges and Roving Archer's Clubhouse**

Although the archery ranges would remain the same except for needed maintenance and repairs, a signage program utilizing orange safety cones would be implemented. The clubhouse would be expanded to 1,000 square feet with ADA-accessible restroom facilities taking up 400 square feet. Additionally, there would be event parking for up to six cars at the clubhouse.

**Additional information required:** Restrooms exist a short walk from the archery range, near the casting pond. What is the reason for the addition of a restroom in the archery range complex? What studies were done to justify the expense of jacking the sewer line under the flood channel? Why was the aesthetic impact of the larger (1,000 sq. feet) Roving Archer Clubhouse (to accommodate both storage and restrooms) not considered or mitigated?

**Additional information required:** The construction of parking spaces near the Roving Archer Clubhouse represents an unnecessary addition of hardscape to this area. It seriously interferes with the stated purpose of the Lower Arroyo, which is “to preserve the natural beauty”. A parking lot exists within a few feet of the archery range. In a small natural setting, parking should be concentrated in one place. How was the need for this parking area determined? How will personnel enforce the no parking rule during non-event times (most times)?

**Additional analysis required:** The Pasadena Roving Archers currently use a dirt area by the Clubhouse for parking vehicles delivering or picking up equipment used only during tournaments. Formalized parking is not required nor appropriate for this area.

#### **5. Section 2.3.4.9 – Bridge Crossing at Archer’s Clubhouse**

The existing 15-foot bridge that crosses over the flood channel to the Roving Archers’ Clubhouse would be improved with a 10-foot swinging gate. The remaining 5-foot gap would allow for hikers, walkers and cyclists to cross the bridge.

**Additional information required:** Since cyclists are restricted to the Westside Multi-use Trail, why would they need to cross this bridge? Allowing cyclists to access the Lower Arroyo by crossing this bridge will compromise the safety of the equestrians and pedestrians on the Eastside trail.

**Additional analysis required:** Bicycle access via the main entrance to the Lower Arroyo at South Arroyo Boulevard and Norwood Drive would necessitate cyclists crossing the Eastside equestrian and pedestrian trail. No mitigation for unlawful access to the Eastside trail is provided. Personal and horse safety issues are not mentioned nor mitigation offered.

#### **6. Section 2.3.4.10 – Improve Westside Multi-Use Trail Access at Parker-Mayberry Bridge**

The northern end of the existing Westside trail would be improved to allow a small maintenance vehicle, cyclists and pedestrians’ access onto the west side of the existing Parker-Mayberry Maintenance Bridge. Directed use of the maintenance bridge would allow users to cross the arroyo and exit on Arroyo Boulevard. An improvement along the access trail will expand the width of the trail to 18 feet.

**Additional information required:** The crossing, as described, will intersect with the East side trail. How will equestrians’ be protected from the cyclists? What analysis was performed of the habitat, which will be destroyed when the trail is widened? There is no available parking on South Arroyo Boulevard at the entrance to the Parker-Mayberry Bridge, so pedestrian use is very limited. Is this “improvement” of sufficient value to warrant it’s inclusion in the LAMP? If the no bicycle ordinance remains in effect, there is no reasonable need for this entrance “improvement”.

## 7. Section 2.3.4.11 – Westside Multi-use Trail for Bicyclists and Hikers

This project element would create a new designated recreational bikeway along the west side of the flood control channel from the Parker-Mayberry Bridge to the new Southern Entry at Arroyo Boulevard.

**Additional analysis required:** The bikeway will connect to the Class III bikeway along Arroyo Boulevard. Since the Class III bikeway is used mainly by high-speed cyclists, will those users be allowed on the trail with hikers and dog walkers? If not, what is the purpose of the connection to the Arroyo Boulevard bikeway. And how will the high speed (pack) cyclists be prevented from using the trail?

**Additional information required:** The northern end of the bikeway will cross the Eastside Trail. What safety measures will be in place to protect horses, cyclists and hikers?

**Additional analysis required:** The statement is made that the existing trail would be improved and its alignment adjusted to create a more desirable landscape. Another statement claims that the area traverses some wonderful, wide expanses with great potential for habitat restoration. Since the trail will be widened and straightened, won't this destroy and divide some of the natural habitat? Informal rest areas and picnic tables will further intrude on the natural setting along the trail and discourage the wildlife in the area from establishing nests, etc. The MEIR inadequately addresses the impact of the bikeway on the Lower Arroyo.

**Additional analysis required:** Despite continued opposition to a bikeway in the Lower Arroyo, this element is included in the LAMP. The MEIR does not explain how the inclusion of the bikeway will enhance the "restoration" of the area. In fact, due to physical limitations along the Westside of the flood control channel, it will be impossible to accommodate both hikers and cyclists safely on the proposed trail. Explain how hikers and cyclists can be accommodated?

**Additional analysis required:** Directly beneath the La Loma Bridge the trail narrows to approximately 5 feet as it passes between the flood control channel and the massive supporting leg of the bridge. A similar trail width restriction exists near the south end of the trail where there is a concrete retaining wall. There is no mention of the mitigation (safety) measures that will be necessary to allow room for more than one bike to pass that area. In fact the only mitigation measures proposed consist of signage, which will not ensure the safety of the bikeway users. The safety issues related to mixing bicycles, walkers, joggers and dogs cannot be mitigated by signage. Enforcement of existing and proposed rules will require additional personal assigned to that duty on a daily basis. The MEIR fails to define how the trail would be policed and the posted rules enforced. It would not be possible for the mounted police to patrol the trail due to conflicts with bicycles. There are no impacts listed for damage done to the habitat when cyclists wander off the trail. Please explain what safety

measures would be employed in this area, and what their impacts are. How would the trails be policed?

**Additional analysis required:** Current use by equestrians would be limited to the Eastside of the flood control measures. What analysis was done concerning the impact of equestrians using only one side of the trail including increased use which can present additional conflict with pedestrians and dogs? What enforceable plan will be in place to prevent cyclists from using the Eastside trail?

**Additional analysis required:** Although the unstable slopes of the Camel's Hump area are included for analysis in Mitigation Measure Geology -7, there is no mention of the unstable slopes along the Westside trail. During rainy periods in the past these slopes have been very unstable, and in fact the trail has been closed due to landslides. The MEIR inadequately addresses this geology hazard.

**Preferred alternative:** The current trail is adequate and provides a natural preservation area that should not be disturbed by the widening and straightening of the trail. It would be preferable to perform only the deferred maintenance on the trail, with some improvement of the surface levels, and maintain the natural character of the area. There has been considerable opposition to the inclusion of a bikeway in the Lower Arroyo, where bicycles are currently not allowed. In order to maintain this natural area bicycles should be kept out. This is clearly the most important issue among the current users of the Lower Arroyo. The Lower Arroyo should be maintained as a natural hiking and jogging and equestrian area.

#### 8. Section 2.3.4.11.5 – Provide Picnic Tables

Picnic tables placed in this Lower Arroyo area may attract litter and an accumulation of general debris. More trash cans would be required, possibly ones that lock. A natural area doesn't need picnic tables and could adversely affect the environment in a number of ways. Picnic tables placed in the Lower Arroyo over the years have been "trashed" by visitors. This particular area is not an appropriate location for picnic tables.

**Additional analysis required:** The MEIR proposes a substantial increase in active recreation in the Arroyo Seco. These type of activities generate an increase in refuse and litter. It is well documented that a consistent refuse source substantially increases the populations of non-native birds such as ravens, crows, and cowbirds in these areas. These birds have a significant impact on native songbird populations and other sensitive species. For example, the cowbird, through nest predation, has significantly impacted the survivability of the California gnatcatcher and is primarily responsible for the placement of this species on the endangered species list. The United Fish and Wildlife Service is currently undertaking large cowbird trapping programs to try to ameliorate the affect of cowbirds on this species. The City may find themselves in the same position as the acceleration of active recreation in the Arroyo Seco will certainly

result in an increase in the population of non-native bird species. The impact of these species on native population must be assessed in the MEIR.

**Additional information required:** How will this area be policed? Alcoholic beverage use is currently a problem in the parking lot and Archer's clubhouse area where enforcement should be much easier but is rarely present. The area below the La Loma bridge designated for picnic tables is one of the largest open natural parts of the Lower Arroyo. Picnicking would change the character of this area. Increased noise is not considered in the MEIR.

**Additional information needed:** How will these areas be maintained and kept free of litter? This is not described in the MEIR.

**Additional information needed:** In the past picnic tables (even concrete ones) have been destroyed by vandals. For that reason they were removed. Please explain how the City proposes to adequately maintain new tables.

**Additional analysis required:** The impact on government services has not been evaluated. The impact on the aesthetics of the area has not been considered.

**Recommended alternative:** Remove plans to install picnic tables in a natural preservation area.

#### **9. Section 2.3.4.12.3 - Provide Rest Areas**

**Additional information needed:** The MEIR fails to adequately describe where the 92,000 square feet of brush clearing is to occur. This area is where a California Gnatcatcher (an endangered species) was seen in 6/2001.

#### **10. Section 2.3.4.14 – Install New Pedestrian Bridge to Connect Camel's Hump with Westside Trail**

A new bridge would be installed across the flood control channel to connect the Camel's Hump area with the Westside Multi-use Trail, about halfway between the La Loma Bridge and the San Rafael Bridge at Laguna.

**Additional information required:** There are currently three bridge crossings within the 1.75-mile Lower Arroyo area. What analysis was done to justify the addition of a fourth bridge? The ADA-accessible trail is located along the Eastside Multi-use Loop Trail between the Casting Pond and the La Casita del Arroyo. Why is it necessary to build an ADA-accessible bridge at this location? Is it necessary to have a crossing for maintenance utility vehicles to cross at this point? Since emergency vehicles will not be allowed to cross the bridge, there seems to be no life/safety issue and there are two bridges within a short distance that will allow maintenance access.

**Additional information required:** How can the crossing of bicycles from the Westside trail to the Eastside trail be prevented? This is a serious safety issue as unlawful bicycles would interfere with pedestrian and equestrian uses of the Eastside trail.

**Additional information required:** How can the bridge meet the aesthetic impact standards in MEIR Section 3.1.4.3.2?

**Preferred alternative:** In order to maintain as much of the natural area as possible and to conserve funds, it is preferable that a bridge not be built in the Camel's Hump area.

**11. Section 2.3.4.15 – Westside Pedestrian Trail – to Separate Southern Archery Range from Westside Multi-Use Trail**

**Additional information needed:** On what basis was the need for this project established? There is an existing trail already in place that is quite natural.

**Additional analysis required:** Why is it necessary to place the trail further into the hillside habitat when the trail along the edge of the channel currently exists?

**Additional analysis required:** The MEIR fails to adequately describe the impact of the multiple projects on the east and west sides of this natural area.

**12. Section 2.3.4.15.2 - Provide Signage for “Range in Use”**

This section states (in full): *“This trail would keep the archery activity separated from the other park uses and provide improved safety with the addition of the new bicycle route through signage. Archers would be prohibited from using the Westside Multi-use Trail through signage.”*

**Additional information needed:** This statement is **very** unclear and appears to relate to the trail, rather than signage. Furthermore, it appears that with the bike and walking trails proposed for the Westside, signage is the only mitigation slated for protecting public safety. No mention is made as to who is responsible for posting and removing the signage when the range is in and not in use. Please clarify and explain fully how this signage would be different than signage which is currently in use by Archers.

**13. Section 2.3.4.15.3 - Landscape to Blend with Surrounding Habitat Restoration Project**

**Additional information needed:** What is “compacted Class II base material? What Browning-Ferris Industries (BFI) habitat restoration project is on the west side near the southern archery Range? Do you mean the area on the Westside north of the Archery Clubhouse?

**14. Section 2.3.4.16.1 - Restore Arroyo Boulevard Rim Trail**

**Additional information needed:** The MEIR fails to describe the surface to be used for this trail. Given its proximity to the natural areas, will a permeable surface such as decomposed granite be used?

**Additional information needed:** In places the rim becomes quite narrow. Will trees and other features have to be removed? What will the effect on the environment be if these items are removed?

**Additional analysis required:** The surface should be adequate for ADA accessible devices but would discourage bicyclists, skateboarders and roller bladers.

**Additional analysis required:** No mention was made as to how the “Pedestrians Only” use will be enforced – impact of increased government services is significant.

#### 15. Section 2.3.4.18 - Memorial Grove Restoration

The MEIR does state, *“The area has not been well maintained over time.”*

**Additional analysis required:** The MEIR fails to state how this “restored” area is to be maintained and what the impacts will be.

**Additional information needed:** Would the trees selected by the Parks and Natural Resources Division of the City specify only native trees?

#### 16. Section 2.3.4.18.1 – Low Flow Stream Extension

A low-flow stream system would be introduced to this area as a continuation of the low-flow stream system to the north into the area, and riparian woodland framework would be incorporated into the landscape.

**Additional information needed:** What do you mean by the word “framework” in the phrase “riparian woodland framework would be incorporated into the landscape”?

**Additional analysis required:** The MEIR does not address the feasibility of an Arroyo-wide watershed plan which includes further study of the feasibility of removal of parts or all of the concrete flood control channel and natural stream restoration.

**Additional analysis required:** It is not prudent or economically sound to embark on another artificial low flow stream program until all options are explored and studied. The MEIR makes no reference to the extensive civil work required to extend the stream as there are significant earth removal and reshaping of the area between the exit of the existing BFI low flow stream and the Memorial Grove.

**Additional analysis required:** The MEIR makes no reference to the effect on native landscaping or wildlife. This is clearly a significant project but no consideration is given to impact thresholds in Section 3.1.3

#### 17. Section 2.3.4.2.4 – Main Entrance at Arroyo Boulevard and Norwood Drive

This project element would upgrade the existing entrance located near the intersection of Arroyo Boulevard and Norwood Drive.

**Additional analysis required:** A 24 ft. wide road requires extensive civil work, removal of existing mature trees and shrubbery, and addition of retaining walls. This will also change aesthetic values. Widening is only required to accommodate bicyclists, per the MEIR. The present ordinance prohibits bicycles in the Lower Arroyo so if no bicycle path is adopted, there is no justification for the widening of the road.. The Pasadena Fire Department currently conducts training exercises with fire engines in the parking lot area and successfully utilizes the existing road.

#### 18. Section 2.3.4.18.2 - Create an Open Natural Area

**Additional information needed:** The MEIR fails to identify the area where “60,000 square feet of brush clearance” will occur. This area is where a California Gnatcatcher (an endangered species) was seen in 6/2001.

**Additional analysis required:** The impact of removal of protective vegetation for wildlife and breeding areas is not discussed in the MEIR. A complete environmental impact analysis on the effect on wildlife is required. Further, over-clearance measures have significant negative impact on the environment in a natural area. A more adequate description of the planned extent and nature of clearance measures needs to be addressed.

## **XIX. Comments on Design Guidelines**

The proposed Design Guidelines provide some criteria for public use buildings, such as recreational/ clubhouse facilities, restrooms, maintenance facilities and open structures. Included in the Design Guidelines is a signage program for use throughout the Arroyo Seco. New fences, entrances, and gates are being proposed. A framework for public art is another component. Furnishings such as lighting, trash enclosures, benches, tables, drinking fountains will also be designed in the future.

According to the Arroyo Seco Design Guidelines, most of these improvements are considered “minor park improvement activities” and “will be subject to a substantial conformance review by the Parks and Natural Resources Administrator for compliance with the Arroyo Seco Master Design Guidelines. These minor improvements may include: repair or replacement of existing structures and plant materials; new construction less than 50,000 square feet; small landscape or facility improvements that are not visible from a public street or walkway.” (Arroyo Seco Design Guidelines, page I-2)

CPAS is very troubled by this proposed process which leaves much of the decision making in the hands of the Parks and Natural Resources Administrator and closes out review and discussion by the Recreation and Parks Commission, the Design Commission, and the public.

### **1. Implementation Process 2.1 Minor Park Improvements – Role of the Design Commission**

There are many examples of inappropriate changes to Pasadena parks and open spaces that have occurred without public input. Two examples demonstrate this point. Several years ago, an historic Batchelder fountain in Memorial Park was demolished by Public Works to be replaced with a newer ill-designed fountain. Several large electrical vaults have been added to Central Park but without any thought as to how the surrounding area might be landscaped or if a simple structure would have been preferable to house the units. Several large refuse containers nearby contribute to blight in Central Park.

**Recommended alternative:** Include requirement that The Design Commission review all changes to the built environment anywhere in the Arroyo Seco – including, but not limited to, fountains, bicycle racks, buildings, additions, restrooms, lighting, signage, trails, paths, entrances, gates, benches, picnic tables, public works maintenance facilities etc.

### **2. Proposed Improvements**

The Design Guidelines propose an extensive and expensive signage system which will be difficult to maintain and likely to be vandalized. There are other proposals for bridges, gates, road widenings, additional restrooms, paved bike paths, and parking lots.

**Additional information needed:** What was the City’s basis for recommending these “improvements”?

**Additional analysis required:** The MEIR is inadequate – impact on government services (for maintenance) was not evaluated.

**Suggested alternative:** Historic elements like the WPA pathway system and Arroyo boulder walls should be repaired and appropriate native plantings should be re-introduced into the Arroyo Seco.

### **3. Removal of Concrete Flood Control Channel and Restoration of the Natural Flow of the Stream**

The removal of the concrete flood control channel and the return of the natural streambed have been under discussion for decades. We have the opportunity to make this important change for the lives of the citizen’s of Pasadena and for future generations. Residents have been waiting five years for the unveiling of a restoration plan and finally a restoration feasibility study has been released<sup>10</sup>.

**Suggested alternative that must be evaluated:** Removal of concrete and restoration of the river should be the centerpiece of the Master Plan and the MEIR, not an afterthought.. These projects, as opposed to others in the MEIR, do in fact preserve, protect and maintain our natural treasure. Concepts from the Arroyo Seco Watershed Restoration Feasibility Study, a cooperative project of North East Trees and the Arroyo Seco Foundation, should be incorporated into the ASMP, the most notable among these being the naturalization of the Arroyo Seco streambed and the removal of the concrete channel.

**Additional information and analysis required:** This study includes a wealth of information which should be used to present a conservation/habitat restoration alternative to the infrastructure and asphalt emphasis of the current plan and alternatives as detailed in the MEIR. The City of Pasadena has been aware that the Arroyo Seco Foundation was conducting a Watershed Restoration Feasibility Study. City staff attended some of the meetings, yet the City of Pasadena has failed to include much of the Arroyo Seco Foundation’s findings in the current ASMP. Removal and restoration of the flood control channel is a viable possibility and must be included in if not the main focus of any ASMP & MEIR.

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<sup>10</sup> Arroyo Seco Watershed Restoration Feasibility Study prepared for the California Coastal Conservancy by North East Trees in collaboration with the Arroyo Seco Foundation, May 31, 2002.

## XX. Comments on Related Projects

### Related Projects (MEIR Section 2.5)

Section 2.5 of the MEIR is a table of projects that could contribute to impacts created by the proposed project. This list is based “*on information on file at the City of Pasadena Planning Department, as well as recently (sic) accepted traffic impact reports prepared for project within the City of Pasadena.*”

**Additional information required:** The sentence above, which is quoted directly from Section 2.5, does not make sense. Please clarify.

**Additional analysis required:** There is no discussion of how the projects listed in the table of Section 2.5 would contribute to the impacts created by the proposed project. How will the related projects contribute to the impacts of the proposed project? Many of the projects appear to be a great distance from the proposed project.

**Additional information required:** Is the listing merely a compilation of all projects within the City of Pasadena regardless of the possible impacts on the proposed project? On what date were the City Planning Department projects accessed? On what date were the traffic reports accessed?

**Additional analysis required:** What are the environmental impacts from the related projects? How will the impacts be mitigated? How will the projects preserve, maintain and protect the Arroyo Seco or how will they be built to do so?

## XXI. Comments on Alternatives

There little information in the discussion of alternatives to allow for “*meaningful evaluation, analysis and comparison with the proposed project*” (14 CCR §15126.6 (c)).

Alternatives have been offered for some (but not all) of the proposed projects in the ASMP. Many are listed here, but should not be considered a complete list of alternatives for all projects.

**Additional analysis required:** In future meetings with the public, identify reasonable alternatives for all proposed projects to ensure that citizens are given an opportunity to respond to the projects and to ensure that they are all in keeping with the goals of renovation, restoration and preservation of the natural preservation area. I like this!!

### Water Resources, Habitat, and Watershed Restoration

#### 1. The MEIR is inadequate as it relates to issues of water resources, habitat and watershed restoration.

There are a series of projects identified in the ASMP that could be detrimental to water quality and water resources. There does not appear to have been a serious effort to design the Hahamongna elements of the ASMP in a more environmentally and habitat-friendly manner. In contrast, the recently-completed Arroyo Seco Watershed Restoration Plan (ASWRP) contains many useful concepts and alternatives that relate to water quality, hydrology and watershed restoration. (These concepts can be found in the ASWRP technical appendices.)

**Additional information needed:** Why does the MEIR fail to address these concepts and alternatives?

**Additional analysis required:** The MEIR is inadequate insofar as it fails to consider the water quality and hydrology concepts and alternatives contained in the ASWRP.

#### 2. Alternatives and recommendations in study not considered

In January 2000, Philip Williams & Associates presented a Flood Hazard, Sediment Management and Water Feature Analyses to Takata & Associates for presentation to the City. This report covers the flood control, water conservation and water feature aspect of the HWP MP. The report was never adopted. No mention of this report – paid for with taxpayer funds – is made in the MEIR or the HWP MP. No feature of this report made it into the HWP MP and it is not discussed as an alternative.

14 CCR §15126.6 (c) states: “*The MEIR should also identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the Lead Agency's determination.*”

**Additional analysis required:** To comply with this Section, the Philip Williams & Associates recommendations should be considered as alternatives and reasons given

why their recommendations were rejected. The public should have a chance to question the City about this study especially as it was funded by the taxpayer.

The thesis in the Philip Williams report focused on:

- The inefficiency of spreading basins as a means of replenishing the aquifer. They silt up, require heavy equipment to maintain which results in compacting and reduced hydrolic conductivity.
- The ability of natural streamflow to provide equal percolation to spreading basins.
- The use of temporary ponding at the dam to assist with replenishing the aquifer—using the dam as a giant spreading basin.

They recommended:

- Removing the spreading basins and converting them to natural habitat resulting in cost savings.
- Using the natural stream as the Park's water feature.
- Avoiding standing ponds as they are expensive to maintain and unnatural.
- No pump back system as they feel it is expensive and destructive to install.
- Selective sediment removal which may not involve the wholesale destruction of all vegetation below 1030msl.

The report also acknowledged the community's wish to preserve the natural environment. It is interesting that the subject of this report of a hundred and fifty pages is covered by the City in three pages of the MEIR. The PWA report makes reference to the permit process, habitat restoration, wildlife preservation and costs.

**Additional analysis required:** Why did the City fail to adopt its consultant's report? The HWP MP adopts most of the features dismissed by the PWA report as unfitting for the area or too expensive. However, for the City to prevent the public from seeing and discussing this report as an alternative project under the MEIR places them outside the requirements of CEQA.

**Additional information needed:** The City must give the public a chance to review this option. The City must also provide reasons why it was not adopted.

## **Potential Alternatives for Proposed Projects**

### **1. Removal of Concrete Flood Control Channel and Restoration of the Natural Flow of the Stream**

The removal of the concrete flood control channel and the return of the natural streambed have been under discussion for decades. We have the opportunity to make this important change for the lives of the citizen's of Pasadena and for future generations. Residents have been waiting five years for the unveiling of a restoration plan and finally a restoration feasibility study has been released.

**Suggested alternative that must be evaluated:** Removal of concrete and restoration of the river should be the centerpiece of the Master Plan and the MEIR, not an afterthought.. These projects, as opposed to others in the MEIR, do in fact preserve, protect and maintain our natural treasure. Concepts from the Arroyo Seco Watershed Restoration Feasibility Study, a cooperative project of North East Trees and the Arroyo Seco Foundation, should be incorporated into the ASMP, the most notable among these being the naturalization of the Arroyo Seco streambed and the removal of the concrete channel.

## 2. Soccer Fields

The issue of providing more soccer fields is a noted area of controversy, yet the controversy section fails to even mention the inclusion of more soccer fields in Hahamongna. The doubling of turf grass areas was clearly controversial to those who attended the community outreach meetings. There was much concern over the effect of pesticides and fertilizers on both underground and stream water quality and habitat degradation. There is also concern over providing recreational areas for children who do not attend Pasadena Schools. The overwhelming preference at these meetings was for restoring Hahamongna as a natural area. The MEIR touts rigorous community outreach but then does not even mention the area of greatest controversy to the public who cared enough to get involved in the process.

**Suggested alternatives:** Use of school facilities and other venues must be evaluated.

## 3. Objective to develop a maintenance plan for existing park facilities

The failure of the City to provide adequate stewardship for maintaining the treasure that is the Arroyo Seco must not be allowed to continue. The ASMP does not provide specifics for maintenance for current **or planned** facilities and improvements. The lack of maintenance potentially causes significant environmental impacts which must be evaluated.

**Suggested alternative objective:** To develop a budget for and fund a maintenance plan for existing **and new** facilities which includes a safety component and a fire suppression component. New facilities will not be built without adequate funding for personnel and maintenance.

## 4. Objective to provide ADA access for most of the facilities

Any facilities that qualify as buildings must provide ADA access by law.

**Suggested alternative:** To promote the development of access for physically challenged people in compliance with the spirit of the ADA.

## 5. Parking Structure in Hahamongna Watershed Park

Section 3.1 (Aesthetics) of the MEIR concludes that construction of the six-story parking structure in Hahamongna Watershed Park constitutes a significant impact on aesthetic resources which cannot be mitigated.

**Suggested alternative:** The preferred alternative plan is that no parking structure be built on any natural space. Any garage required by JPL should be built by JPL on JPL land.

**6. Section 2.3.4.6.3 of the MEIR – Archery Lane (& Casting Pond) signage**

Archery trails would be defined with improved signage utilizing orange safety cones to identify archer shooting lanes and to alert other archers that the range is in use. This signage is not needed.

**Suggested alternative:** Provide only signage which relate directly to facilities such as casting pond, archery range, etc. Directional signage on trails is unnecessary since trails are well established and easily visible, inconsistent with the desired natural characteristics of the area, would be costly to maintain and would be targets for graffiti.

**7. Section 2.3.4.6.3 of the MEIR – Archery Lane (& Casting Pond) signage**

Archery trails would be defined with improved signage utilizing orange safety cones to identify archer shooting lanes and to alert other archers that the range is in use.

**Suggested alternative:** Provide only signage which relate directly to facilities such as casting pond, archery range, etc. Directional signage on trails is unnecessary since trails are well established and easily visible, inconsistent with the desired natural characteristics of the area, would be costly to maintain and would be targets for graffiti.

**8. Section 2.3.1.1.1 – HWP Parking Areas Would Destroy Habitat**

The proposed area for a new 10,000 sq. ft. lot for 12 vehicles, plus other elements would destroy existing habitat for the sake of parking.

**Additional analysis required:** The MEIR fails to establish the need for the new parking facilities or to evaluate the destruction hillside and related habitat.

**Suggested alternative:** CPAS suggests that a walkway from road level to the overlook existing area currently accessed through the tunnel might be constructed which would allow foot traffic from the dam to cross under Oak Grove Drive. Persons wishing to park near this overlook could park on Linda Vista or Oak Grove Drive.

**9. Goal of the ASMP inconsistent with City’s Comprehensive General Plan and Land Use Ordinance**

**The goal of the proposed ASMP** is stated: “*to provide facilities for passive and active recreation that support Policy 9.2 of the City’s Comprehensive General Plan in order to provide recreation facilities and programs to meet the diverse needs of City residents and visitors*”. The City of Pasadena’s Arroyo Seco Public Lands Ordinance [Ord. 6403 §2 (part), 1990] (§3.32.020) requires the Arroyo Seco “*be preserved, protected and properly maintained.*”

**Additional analysis required:** The goals of preservation, protection and maintenance must be included and therefore subject to environmental review. The **spirit and goals** of the Guiding Principles of the City of Pasadena’s General Plan and Objectives and Policies of the Land Use Element set forth in Appendix B, are missing from the goal(s) of the ASMP. The MEIR fails to adequately consider the impacts of this missing component. Preservation of Pasadena’s historic character and environment and preservation of open space is of prime importance to its citizens and must be a focus for the ASMP.

**Suggested alternative goal should include reference to :** Policy 9.5 of the General Plan which is to: “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.”

#### **10. Paved Bike Path in Hahamongna (MEIR Section 2.3.1.17)**

Bicycles would be allowed to travel on any existing or proposed paved surface within the park. The proposed path follows the perimeter of Hahamongna on existing vehicle roads and the route will use existing roadway, but portions will require grading and paving in areas that are currently natural.

**Suggested Alternative:** Everything possible should be done to reduce and eliminate paving in this area. There should be no new paving of roads for bikes or for any other purpose. Speed bumps could be installed on the currently paved portions of the path, which would encourage only recreational bike use. This would create an atmosphere more in line with the other uses of the path, such as hikers and equestrians.

#### **11. Section 2.3.1.11.3 – Equestrian Refuse Disposal Area**

The MEIR is deficient in that a separate area for equestrian waste in this location is unnecessary and would be a hardship upon Rose Bowl Riders, since they pick up the manure up every day, store it in covered, water-tight BFI bins, and never pile it on the ground. Tom Sawyer Camp currently uses a bin, which is not covered, but this could easily be rectified without requiring a huge costly road and a 1,000 foot waste enclosure, both of which would degrade valuable parkland.

**Recommended alternative:** Place a trash disposal area in a secluded area of the park such as the former maintenance yard on the MWD property which the City proposes to lease. This would also preclude the need for an additional road on the MWD property.

#### **12. Funding for restoration and conservation of the Arroyo Seco**

Restoration and conservation of the Arroyo Seco should be a primary focus of the ASMP with environmental impacts clearly spelled out in the MEIR.

**Recommended alternative:** If the City has no funds that are to be used specifically for restoration and conservation of the Arroyo, we suggest that it allocate such funds immediately and explain to the citizens the reasoning behind the amount allocated and why it cannot be used for other purposes.

### **13. Section 2.3.4.4 – Provide ADA-accessible Trail**

A 60-linear foot pedestrian pathway and bridge over the east fork of the low-flow stream would be installed to allow access from the parking lot to the clubhouse and casting pond. Existing plantings would be cleared to build the bridge.

**Preferred alternative:** Locate handicapped parking closer to the access road. A new ADA accessible trail may not be necessary.

### **14. Section 2.3.4.11 – Westside Multi-use Trail for Bicyclists and Hikers**

This project element would create a new designated recreational bikeway along the west side of the flood control channel from the Parker-Mayberry Bridge to the new Southern Entry at Arroyo Boulevard.

**Preferred alternative:** The current trail is adequate and provides a natural preservation area that should not be disturbed by the widening and straightening of the trail. It would be preferable to perform only the deferred maintenance on the trail, with some improvement of the surface levels, and maintain the natural character of the area. There has been considerable opposition to the inclusion of a bikeway in the Lower Arroyo, where bicycles are currently not allowed. In order to maintain this natural area bicycles should be kept out. This is clearly the most important issue among the current users of the Lower Arroyo. The Lower Arroyo should be maintained as a natural hiking and jogging and equestrian area.

### **15. Section 2.3.4.11 – Westside Multi-use Trail for Bicyclists and Hikers**

This project element would create a new designated recreational bikeway along the west side of the flood control channel from the Parker-Mayberry Bridge to the new Southern Entry at Arroyo Boulevard.

**Preferred alternative:** The current trail is adequate and provides a natural preservation area that should not be disturbed by the widening and straightening of the trail. It would be preferable to perform only the deferred maintenance on the trail, with some improvement of the surface levels, and maintain the natural character of the area. There has been considerable opposition to the inclusion of a bikeway in the Lower Arroyo, where bicycles are currently not allowed. In order to maintain this natural area bicycles should be kept out. This is clearly the most important issue among the current users of the Lower Arroyo. The Lower Arroyo should be maintained as a natural hiking and jogging and equestrian area.

#### **16. Section 2.3.4.14 – Install New Pedestrian Bridge to Connect Camel’s Hump with Westside Trail**

A new bridge would be installed across the flood control channel to connect the Camel’s Hump area with the Westside Multi-use Trail, about halfway between the La Loma Bridge and the San Rafael Bridge at Laguna.

**Suggested alternative:** To maintain as much of the natural area as possible and conserve funds, a bridge should not be built in the Camel’s Hump area.

#### **17. Implementation Process 2.1 Minor Park Improvements – Role of the Design Commission**

There are many examples of inappropriate changes to Pasadena parks and open spaces that have occurred without public input. Two examples demonstrate this point. Several years ago, an historic Batchelder fountain in Memorial Park was demolished by Public Works to be replaced with a newer ill-designed fountain. Several large electrical vaults have been added to Central Park but without any thought as to how the surrounding area might be landscaped or if a simple structure would have been preferable to house the units. Several large refuse containers nearby contribute to blight in Central Park.

**Recommended alternative:** Include requirement that The Design Commission review all changes to the built environment anywhere in the Arroyo Seco – including, but not limited to, fountains, bicycle racks, buildings, additions, restrooms, lighting, signage, trails, paths, entrances, gates, benches, picnic tables, public works maintenance facilities etc.

#### **18. Proposed Improvements**

The Design Guidelines propose an extensive and expensive signage system which will be difficult to maintain and likely to be vandalized. There are other proposals for bridges, gates, road widenings, additional restrooms, paved bike paths, and parking lots.

**Suggested alternative:** Historic elements like the WPA pathway system and Arroyo boulder walls should be repaired and appropriate native plantings should be re-introduced into the Arroyo Seco.

## XXII. Comments on Existing Conditions, Impacts, Mitigation, And Level of Significance After Mitigation

### 1. Effects on Land Use and Planning

In the second paragraph of the above referenced section of the MEIR Section 3.0, a statement is made that there was no evidence that the proposed project would cause significant environmental effects on land use and planning. In the Executive Summary of the Arroyo Seco Master Plan the Arroyo Seco is described as follows: *“The Arroyo Seco has long been valued as a resource and has been used through history as a source of food and materials....”*

**Additional analysis required:** Because the Arroyo Seco is a valuable historical and cultural resource, any change in the current natural setting will be a change in land use. Proposed parking structures, parking lots, roads and trails through habitat areas, picnic tables, restrooms, more multi-use turf fields, etc. **do** represent a change in the use of the land from the current situation (14 CCR § 15126.2).

**Additional information needed:** Furthermore, there are statements in the MEIR to the effect that, since there has been no previous “plan” there is no change in the land use. Does CEQA define land use and planning so that changes in land use do not have a significant impact unless there is a prior plan in place? If so, please cite this section. 14 CCR § 15125, Environmental Setting, states that [The] *“environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether and impact is significant.”*

**Additional analysis required:** Please apply 14 CCR § 15125 to the proposed new uses for the HWP MP and the LAMP and explain how they might effect environmental impacts related to land use.

### 2. Effects on Natural and Cultural Attribute of the Arroyo Seco

The MEIR ignores the significant impacts of the new facilities on the natural and cultural attributes of the Arroyo, thereby placing the adequacy of the MEIR into question.

**Additional analysis required:** The historic natural state of the Arroyo and its fundamental impact on Pasadena’s history and present require that the ASMP and the MEIR recognize the negative impact any new structures will have on the natural condition of the Arroyo.

**Additional analysis required:** The MEIR must provide mitigation measures for these negative impacts of proposed projects and facilities on the Arroyo’s natural features, or the ASMP must eliminate them.

### 3. Secondary Impacts

Apparently, there is little or no discussion in the MEIR of the “secondary impacts” of the proposed projects in the Hahamongna Watershed Park. Is this true? If so, then the MEIR may be inadequate under CEQA, and may have to be revised and re-circulated for further public comment. However, if we are misinformed, please provide us with a list of page citations where the MEIR discusses such secondary impacts.

### 4. Impacts on Recreation

By stating its purpose, “*to provide facilities for recreation*”, the ASMP only describes the temporary negative impact of their construction upon recreation. The “Significant Impacts” upon the Lower Arroyo described in MEIR 3.11.4.3.1, illustrate how the stated goal of providing facilities for recreation drives policy toward more active use of the Arroyo and away from current Pasadena policy and law which call for passive uses and restoration and maintenance of the Arroyo.

Because the Plan’s stated purpose is to provide facilities for recreation, the MEIR considers projects such as development of parking lots, widening access roads, and expanding existing uses to have short term impacts upon recreation, and ignores the long-term impacts such projects will have on the natural topography of the Lower Arroyo.

Three of the four Significant Impacts identified in the LAMP: 1) development and expansion of two parking lots, 2) a 1,000 square foot public restroom and storage area added to the Roving Archers clubhouse, and 3) “entry improvements and widening of access roads,” are stated to have “*significant short-term impacts*” to recreation, and only during their construction.

**Additional analysis required:** The MEIR has failed to recognize that each of these projects would have **permanent negative** impacts upon the Lower Arroyo as a natural area, and would violate Section 3.32.100 B. of the Arroyo Seco Public Lands Ordinance, which limits the uses for which new structures can be built in the Lower Arroyo.

**The implications are clear.** If the Master Plan ignores the Arroyo Seco Public Lands Ordinance and makes providing facilities for recreation the Plan’s primary goal, the City thereby renounces stewardship of the Arroyo in exchange for paving roads, enlarging existing facilities and building parking lots. If, on the other hand, the Plan’s primary goal is to follow the Arroyo Seco Ordinance and treat the Lower Arroyo as a natural preservation area as provided by the Ordinance, the Master Plan must eliminate all such projects or limit them significantly.

## XXIII. Conclusion

The ASMP ignores public testimony, the General Plan, and the Arroyo Seco Ordinance's requirements and prohibitions, and constitutes a radical departure from past and current Pasadena policy. In the face of Pasadena's history and clear desire to preserve and protect the Arroyo's natural condition, the City has astonishingly put forth an Arroyo Seco Master Plan whose stated purpose is to **provide facilities** for recreation in the Arroyo.

In pursuit of that purpose, the ASMP proposes to widen roads and trails, add roads and parking lots large enough for buses to turn around in, and enlarge existing buildings. This is a radical departure from past and current Pasadena policy as described above and is achieved by

- Ignoring the Arroyo Seco Public Lands Ordinance;
- Misrepresenting General Plan Objective 9;
- Shunting aside public testimony which favors a project that preserves the natural environment in the Arroyo; and
- Inserting engineering and development oriented proposals from City departments which are either contrary to public testimony or barely discussed prior to their appearance in the ASMP.

### **Arroyo Seco Public Lands Ordinance.**

The Arroyo Seco Public Land Ordinance, PMC Section 3.32.100 among other things establishes the Natural Preservation Area in the Lower Arroyo. The Ordinance does not define "natural protection area," but the Ordinance's preamble and permitted uses and limitations provide clear guidance.

Sec. 3.32.110 A.-C. sets forth the uses permitted in the Lower Arroyo.

*A. Low intensity recreational activities within defined activity areas, including hiking, horseback riding, archery, casting, picnicking and jogging.*

*B. New structures shall be limited to those required for utility operations, park maintenance and protection of plant and animal communities. (NB: the Ordinance defines "structures" to mean "any man made improvement.")*

*C. All existing uses may be allowed to remain but not allowed to expand."*

It is very clear that what can be done in the Lower Arroyo is limited to current activities and conditions.

Sec. 3.32.120 states that *"all lands within the natural preservation area are to be designated as a natural preserve and shall be subject to (ten) limitations."*

Four limitations are of particular relevance:

1. *No excavation or landfill shall be permitted on the slope banks of the Arroyo Seco except for repairs to ensure public health and safety or for undergrounding of utilities as determined by the City Manager.*
2. *The use or parking of motor vehicles outside existing paved streets, driveways, parking lots or other designated areas is prohibited, except for maintenance and emergency purposes.*
3. *Trails and roads shall not be paved.*
4. *Except for threat to privately owned lands, structures or public safety, nothing in this chapter shall preclude modifications of the flood control channel to restore all or part of the natural stream in the Lower Arroyo Seco.*

At the most, these sections of the Ordinance call for continuing (with enhancements, such as trail restoration) existing “*low intensity recreational activities.*” At the least, they prohibit new structures, parking lots, paved trails or roads.

### **Pasadena General Plan Objective 9**

There is always a tug of war between the need for recreational uses, the need to accommodate additional traffic, and the need for natural areas where we can take time out from our hectic daily life and simply enjoy the blessings of nature.

The ASMP purports to balance these competing demands, but the Plan’s stated goal betrays that assertion. The Plan’s stated goal is:

*“to provide facilities for passive and active recreation that support Policy 9.2 of the City of Pasadena’s Comprehensive Master Plan in order to provide recreation facilities and programs to meet the diverse needs of the City of Pasadena residents and visitors.”* (Arroyo Seco Master Plan, ES-2)

The ASMP’s defining statement is a radical departure from past and current policies to preserve and maintain the natural aspects of the Arroyo Seco.

The ASMP misrepresents General Plan Objective 9, is contrary to existing policy and law as set forth in the Arroyo Seco Public Lands Ordinance, and does not follow the clear desire of people who took part in the process for preservation and maintenance of the existing natural attributes of the Arroyo.

We mustn’t brush over this, because all flows from the Master Plan’s stated purpose. It determines what projects and improvements we put in the Arroyo and also determines the adequacy of the MEIR.

As the purported basis for the ASMP, notice what General Plan Objective 9, entitled “*Open Space Preservation and Acquisition*” states:

**“Policy 9.2-Arroyo Seco:** *Continue and complete comprehensive planning for, and implementation of, plans for the Arroyo, including restoration of the natural area of the Lower Arroyo and the development of the Hahamongna Watershed Plan.*”

**“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. ...”

Active and passive recreation has always been part of the Arroyo, and is provided for in the Arroyo Seco Ordinance. Nonetheless, at the risk of over stating the case, the only time “recreation” is mentioned in Objective 9 is in Policy 9.3, which applies to Eaton Canyon. “Recreation” is not a General Plan Policy for the Arroyo as a whole, nor in Policy 9.2, which applies to the Lower Arroyo.

We must set the correct policy to be our guide for development in the Arroyo. We cannot ignore the existence and desirability of recreation in the Arroyo, but throughout history, every City action with regard to the Arroyo tilts toward preserving the natural areas of the Arroyo Seco and away from excavation, paving roads or trails, or creating parking lots in the Arroyo.

By advocating extensive new infrastructure in Hahamongna and the Lower Arroyo, the Master Plan violates what has always been the essential spirit of Pasadena’s care for the Arroyo, prescribed in General Plan Policy 9.5, which is that *Pasadena must be a steward of this rich natural area.*

**Stewardship is a very straightforward concept:** Stewardship means to develop and implement major programs for the protection, rehabilitation, restoration, and enhancement of the basic natural systems and outstanding scenic features of the area.

The ASMP falls far short of providing a plan of stewardship. Rather than showing us how to exercise stewardship, the ASMP emphasizes development, maintenance and alteration of facilities and physical installations whose purposes are not the protection of the Arroyo’s natural scenic resources.

One step in the stewardship process should be to insure that the Design Commission be given an active role in the review of the ASMP and MEIR and should have a future and permanent role in the review of any changes of the built environment anywhere in the Arroyo Seco.

### **Public Testimony**

Public testimony throughout this process has overwhelmingly supported preserving and protecting the natural areas of the Arroyo. We are shocked that after all this, the Master Plan states its purpose to be the build facilities in the Arroyo to foster recreation.

### **Focus on Natural Resource – Keep the Arroyo Natural !!**

Time and expense has been incurred in the preparation of the ASMP and the MEIR; however, CPAS asks the City Council not to certify these documents because of the

reasons set forth in this document. CPAS is of the opinion that these documents have the wrong focus for preserving, protecting and maintaining our City's treasure and thus cannot be amended to achieve a viable plan for the Arroyo Seco. Moreover, CPAS ask the City Council to think about the nature, extent and contents of the next environmental documents to be prepared for the Arroyo Seco.

We suggest that the environmental review process begin again with the focus **on the Arroyo Seco's natural environment** and of its preservation, protection and maintenance. The City needs to insure that the final ASMP and MEIR consider what the people of the City, as opposed to staff, would like to see happen in the Arroyo.

## **Appendix A**

### **Neighborhood and Environmental Associations and Community Groups Represented on CPAS + Individual Signatories**

Many of these groups and individuals have also submitted their own additional letters to the City with comments to which the City is required to respond.

CPAS members participating have included representatives from:

#### **Neighborhood Associations Represented**

- Arroyo Terrace Neighborhood Association
- Continental Townhomes, Homeowners Association
- East Arroyo Residents' Association
- Florecita Farm Association of Neighbors
- Lincoln-Howard-Arroyo-Freeway Association
- Linda Vista/Annandale Association
- Madison Heights Neighborhood Association
- Putney Area Neighbors
- Singer Park Neighborhood Association
- Washington Square Neighborhood Association
- West Pasadena Residents' Association
- Windsor-Arroyo Neighborhood Association

#### **Environmental Organizations and Community Stakeholder representatives**

- Altadena Equestrian Resources
- Arroyo Seco Foundation
- Equestrian Trails, Inc
- Hahamongna Watchdog Group
- La Cañada Trails Council
- Pasadena Audubon Society
- Pasadena Beautiful
- Pasadena Heritage
- Pasadena Group – Sierra Club
- People for the Arroyo
- Rose Bowl Riders

**Appendix B**  
**LAMP Introductory Remarks**

Attached herein are pages from the Lower Arroyo Master Plan Introductory Remarks.

**Appendix C**  
**City of Pasadena Public Lands Ordinance**

**Appendix D**  
**City of Pasadena General Plan Guiding Principles,  
Land Use Element and Social Element**

Attached herein are:

- The City of Pasadena General Plan Guiding Principles
- The City of Pasadena General Plan Land Use Element
- The City of Pasadena General Plan Social Element