



PASADENA AUDUBON SOCIETY

Founded April 1904

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September 13, 2002

City of Pasadena
Planning and Permitting Department
Attn: Mr. Joshua Hart
175 N. Garfield Avenue
Pasadena, CA 91109-7215

**RE: Pasadena Audubon Society Comments on Draft Environmental Impact Report
20000091062 & Arroyo Seco Master Plan**

Dear Mr. Hart:

The Pasadena Audubon Society (PAS) appreciates the opportunity to comment on the City of Pasadena's Draft Environmental Impact Report for the Arroyo Seco Master Plan Project. We also wish to thank the dedicated staff who worked on putting these documents together.

Pasadena Audubon, founded in 1904, is the oldest chapter of the National Audubon Society in California. We have over 1500 members in the Pasadena area. Our group's mission is "to bring the excitement of birds to our community through birding, education and the conservation of bird habitats." PAS looks forward to assisting the City meet the objectives of restoration and conservation of the natural environment.

The Arroyo Seco, in its entirety, offers unique opportunities for education and increased understanding of wildlife and its habitats within an urban setting. PAS members walk and bird regularly throughout the Arroyo Seco and PAS has regularly included the Arroyo Seco in its Annual Christmas Bird Count for the last 50 years. During this period the count numbers reflect the significant impact which urban incursion has had on this natural space.

Due to the size and complexity of the Draft MEIR and Master Plan, PAS will respond in three ways, General Comments (Attachment I) and Detailed Comments (Appendix II), and Detailed Comments to the Hahamongna section of the Arroyo Seco Master Plan. Even though this letter's focus will be on the evaluation of the adequacy of the Draft MEIR, our comments also applies to the other natural areas.

We again request continued notification of any and all meetings, documents

and/or proposed changes related to the Arroyo Seco Master Plan and the Arroyo Seco Ordinance, as well as any future requests for permits from USFWS, CDFG, COE, Regional Water Quality Board, etc. that impact any part of the Arroyo Seco.

Should you have any questions, you may contact Donald G. Rogers at 626-286-2546, Tracey Alsobrook at 626-797-5559, Mickey Long 626-285-8878 or myself at 626-449-3625.

Sincerely,

A handwritten signature in black ink that reads "Ron Cyger". The signature is fluid and cursive, with a large initial "R" and a long, sweeping tail.

Ron Cyger, President
Pasadena Chapter
National Audubon Society

Attachments

- I General Comments on ASMEIR
- II Detailed Comments on ASMEIR
- III Detailed Comments on Hahamongna portion of ASMP

cc: Rosa Laveaga, Recreation & Parks Department
Kevin Clark, US Fish & Wildlife Service
Scott Harris, California Department of Fish & Game
Brian Whelan, Army Corps of Engineers
CEQA Review Staff, Los Angeles Regional Water Quality Control Board
Dan Sharp, County Department of Public Works, Watershed Management Division
Jody Cook, Angeles National Forest
Jerry Secundy, California Audubon Society

Pasadena Audubon Society
Attachment I
General Questions & Comments on the Draft ASMEIR & Arroyo Seco Master Plan
Report # 20000091062

The size and complexity of the Draft MEIR, Master Plan, CEQA law, and other environmental regulations make the comment process a daunting task. It is clear that both of these documents present the City of Pasadena's plan to significantly develop the Arroyo Seco, particularly, Hahamongna Watershed Park. The current plan varies significantly from the "Conceptual Version" approved by the City Council in 2000 by fragmenting and scattering key information throughout the documents, thus minimizing the overall impact of the proposed changes. Pasadena Audubon Society's (PAS) comments will focus primarily on the two natural areas of the Arroyo Seco – Hahamongna Watershed Park and the Lower Arroyo. Our primary concern is to preserve existing consolidated habitat and to minimize the fragmentation of open space and the minimizing of hardscaping and infrastructure development in these natural areas. The following comments will raise general questions and concerns about these documents. For more detailed comments, see *Attachment II*.

Leaders and members of the Pasadena Audubon Society regularly utilize the existing habitats of the Hahamongna basin. For the past four years we have offered a monthly bird walk to the public, at least ten walks per year in the basin. In addition to these 40 visits, we have led a number of walks in the Lower Arroyo Seco, south of the casting pond. Using records from these walks, we have prepared a printed bird checklist for Hahamongna. Our last revision of this list documents over 140 species of birds in the Hahamongna basin. We regularly record 35 to 45 species of birds on each trip, indicating excellent diversity and making Hahamongna and the Arroyo Seco an outstanding area for teaching and studying birds of southern California. Further evidence of the healthy avian diversity in the area is the variety of ecological niches occupied by the birds. In the air overhead are swallows and swifts capturing insects on the wing. On the ground are at least twenty-one kinds of seed-eating sparrows and finches and in the low shrubs near water are yellowthroats. Woodpeckers, at least seven species, work the oaks and willows, including dead branches, and in the mature canopies of the willow woodlands are thirteen kinds of insect-eating warblers and vireos each year. Ten species of birds of prey have been recorded hunting in the basin and two-dozen kinds of water birds occur in the seasonal lakes and ponds in the area. For all these reasons, Pasadena Audubon is concerned that the existing habitat be enhanced and not reduced or disturbed by excessive development.

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." (CEQA Section 15124 (1) (B) **Question: 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 City's Arroyo Seco Master Plan planning process has been long and tedious process. The City Council approved the Hahamongna Conceptual Master Plan in February 2000. The conceptual plan included generally described projects with little details. The current Hahamongna Master Plan has more details, which, for many was more than they expected and caused alarm that the plan had "gone too far." The current plan left many with the feeling that the park would be overdeveloped and viewed as *manufactured* nature rather than a natural area with minimal infrastructure. We are concerned that the City Council will view

the new version as the same as the conceptual version. We view this recent version as having a very different look and feel than the Conceptual plan approved 2/7/00.

3. During this planning process the City has not been always clear on its own agenda. Granted, community input was solicited, but later much of the community's concerns were not included in the plan or acknowledged in any meeting records. Many times, projects not mentioned by the community were included in the plan without any explanation as to why it was included. For PAS, it appears that the City had a "hidden agenda" which was not fully articulated, thus fostering community suspicions and a feelings of distrust. This was exemplified in the recent round of community meetings where the city was "only taking comments" and failed to discuss the details of the current expanded plan. The City could have gone a long way towards reestablishing trust by holding meetings to discuss the details of the current plan. It is clear that the common citizen is at a disadvantage by not fully understanding the CEQA process when commenting on these complex documents. It was only later in the comment process that some discussion with City staff occurred. The City's issuance of a Negative Declaration on the MWD Lease further engendered suspicion about the City's motives.
4. People may be misled by many of the planning documents illustrations and displays that picture the Hahamongna basin as filled with water. These images are very seductive, since they imply that the park will be mostly filled with water. In reality, the park will remain dry most of the year, leaving the spreading basins and proposed conservation pool earthen in color. This will be very obvious to persons who view the basin from the dam.
5. Granted, the present Draft EIR and Master Plan project descriptions are more defined than the plan approved by City Council in October 2000, in many cases however, the descriptions of projects fail to describe the work to be done so as to adequately determine the environmental impact of the proposed work. In short, the more general the description, the more general are the impact analysis and mitigation measures. **Question: Will the city make public detailed descriptions that include, but not limited to, drawings, precise location and dimensions, etc?**
6. The Executive Summaries contained in both documents (per CEQA Section 15123-executive Summary) lack the following:
 - 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.**Question: Will the MEIR be revised to include the above information?**
7. In spite of the environment friendly language of the master plan which emphasizes restoring and naturalizing the Arroyo Seco, it is even more apparent that the underlying goal is to increase the number active recreation areas and develop new revenue sources for the City. Any project which increases the total area of paved surfaces (i.e. parking spaces, roads, etc.) will increase motorized traffic and impact the water quality by bringing increased polluted runoff and rate of runoff. The Hahamongna Master Plan 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 good

habitat for humans. We would hope that the city would reevaluate the current plan in an effort to create large areas of natural habit 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 require the introduction of non-native fish and amphibians. Question: Will the City amending the plan by landscaping these features to discourage active recreation (fishing, water play). **Question: Would the City consider revising the plan to include but not limited to the creation of “shaded paths or blinds” which would allow for observation with a minimum of human presence.**

8. The current documents have numerous changes from what city council originally approved 10/2000. Also, the City Council has three new members. In the case of the Lower Arroyo, the plan was improved almost five years ago. During the intervening period increased community awareness and public sentiment has changed. **Question: Will the City of Pasadena consider updating the plan in light of these changes?**
9. 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 eschewed including much of ASF’s findings in the current Master Plan. **Question: Will the City revise the Master Plan in light of the ASF findings?**
10. It has become 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 ASMEIR to be implemented. Many of these projects are proposed by city staff and are not necessarily supported by the community. **Question: What projects in the Master Plan and Draft MEIR already have funding?**
11. Given the fragmentation of many of the projects, there appears to be little if any analysis of the overall impact of the addition of new paved surfaces in the basin. It would be our hope that the city would make all roads and trails on the floor of the Upper and Lower Arroyo Seco of a permeable substance and avoid all use of paving or cement. **Question: Given the new regional water quality standards, how does the City plan to meet these standards with the increased vehicular traffic in the upper and lower Arroyo Seco?**
12. Phillip Williams Study was sent to Takata & Associates for a presentation to the City 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.” It is speculated that the plan was dismissed because it didn’t conform to what the City wanted. In short the City failed to discuss this significant alternative plan per CEQA Section 15126.6 (Discussion of Alternative Projects). **Questions: 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?**
13. Given that the construction of the JPL East Lot was originally done as a temporary arrangement to ease JPL’s parking problems. Questions: **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 its eventual removal? Is a written document/agreement available for public viewing?

14. The Draft MEIR proposes three alternatives for the resolving the JPL Parking problems. None of which are acceptable to the Pasadena Audubon Society. At best, the City should get out of the parking business all together and tell JPL to build their own structure on their on land. **Question: Has or will the City ask JPL/NASA to build their own structure on their property?**
15. Given the current plan's fragmentation of the wildlife habitat and the increased human incursion in to the natural areas, we suggest that the Hahamongna Master Plan 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 Master plan 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. We would like to see the whole basin become the spreading basin as recommended in the Philip Williams & Associates study. With that in mind: **Question: In the case of Hahamongna would the City consider revising the plan 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.
16. The Regional Water Quality Agency requires the City be responsible for all ground water emptying into the City's section of the Arroyo Seco. It appears that the Draft EIR fails to fully identify and analyze the sources of ground water to the Central and Lower Arroyo areas. Additionally, the EIR fails to state proposed mitigation measures for ground water reclamation. **Question: Will the City amend the MEIR to include this information?**
17. The EIR 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. In several places the new JPL parking structure the EIR/Master Plan state the structure will house 1200 or 1700 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. **Questions: 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?**
18. The location of JPL and its growth over the years has impacted the surrounding areas of La Cañada and Altadena. The EIR 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 traffic. **Questions: In what city or cities does JPL reside in? Has JPL formulated a parking master plan?**

19. The EIR fails to provide (per CEQA Section 15176 (b) (4)) costs estimates for the proposed projects. The Master Plan 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. **Question: Has the City prepared a projected budget and funding sources for the Arroyo Seco Master Plan?**

20. 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. **Question: Under what categories are the athletic fields, disc golf, lakes, children’s play areas, parking areas, spreading basins classified in the table?**

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	10.6	8.5	-2.1

trail, dirt road, picnic & camping site, disc golf fairways and pole climbing area)



TOTAL PARK ACREAGE	290.8	290.8	-0.4
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21. Throughout the Master Plan and the Draft ASMEIR, 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. disk golf) as habitat. Wildlife habitat is considered good when there are large areas accessible only by foot. **Question: How does the City define the meaning of habitat as it is used in these documents?**
22. Both documents state that one of the City’s goals is to “*develop new revenue sources for the City*”. No potential sources were identified. In the case of Hahamongna Watershed Park, it is rumored that the area is being developed for large public events, off-site parking for Rose Bowl events to name a few. **Questions: Is the City intending to use Hahamongna Watershed Park for large public events, action movie set with explosions, and off-site parking for Rose Bowl events? What are the current revenue sources for Hahamongna and how is the City currently using them? What are the potential “revenue sources” the City is planning on developing and how will the City use the funds?**
23. The EIR fails to fully address groundwater related issues resulting from the significant increase of active recreation fields in the Hahamongna Watershed Park. Ground water quality will be significantly impacted by fertilizer and herbicides and vehicular. **Question: What specific measures does the City plan to employ to prevent groundwater contamination?**
24. The MEIR fails to fully address the impact of Water Conservation due to the increased number of active recreation fields and lakes in Hahamongna Watershed Park. **Question: Does the City plan to use reclaimed water or City water in relation to the above projects? What is the City plans during drought years, such as this current year?**

The Master Plan Executive Summary (Pages ES-2) states as one of its objectives is to “*Update the Arroyo Seco Public Lands Ordinance;*” **Question: What are the specific changes the City planning for this ordinance? Will there be public hearings prior to any City Council vote? If a public meeting is held on the matter, will the city give public notice on the hearings?**

25. The Pasadena Audubon Society is concerned that Hahamongna Watershed Park and the Lower Arroyo be kept as natural and pastoral as possible. We feel that these areas should not have events, which draw large attendance (i.e., races, concerts, sporting events.) and are not in keeping with the natural setting. The Arroyo Seco Ordinance which states,

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)

Questions: Will the City 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”?

26. 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 US 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.

Pasadena Audubon Society Detailed Comments
Draft Master Environmental Impact Report (Volume 1) - #2000091062
May 16, 2002

Reference	Description	Comments/Questions
Page S-6 Measure Aesthetic 5	Impact of construction of 6 story parking structure	Will the mitigation measures (berming, vegetative treatment, etc.) be within the planned footprint of the structure or will it encroach further into parkland?
Page S-8 Measure Air-2	Monthly monitoring reports from contractor	How will the city insure that the contractor's monitoring is accurate? What are the consequences if the contractor fails to comply with this requirement?
Page S-12 Measure Air-12	Turn off equipment after idling 15 minutes	How will the city assure that the equipment operators fulfill this requirement? What are the consequences if the contractor fails to comply with this requirement?
Page S-13 Measure Biological -2	Loss of wetlands and riparian habitats	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?
Page S-27 Measure Geological	Bank stabilization of casting pond and Camel's Hump areas	This area is the site (Camel's Hump) where an endangered species (California Gnatcatcher) was observed in 6/2001. We question the need for this "improvement." On what basis was the "potential risk of loss or injury" determined? Are both of these areas sufficiently geologically unstable (prone to landslides, etc.), or is the risk based on people climbing on these hillside areas?
Page S-38 Measure Utilities and Service Systems-1	New Sewage system	Will the trenching for new sewage pipes be routed under existing roadways instead of through the habitat (oak woodlands, sage scrub, etc.)? Does the city plan on ANY trenching through the oak woodland?
Page S-40 Measure Utilities and Service Systems-4	Relocating/replacement of power/communication lines underground.	Will the trenching for underground conduits be routed under existing roadways instead of through the habitat (oak woodlands, sage scrub, etc.)? Does the city plan on ANY trenching through the oak woodland?
Page 1-3 Purpose of the EIR	Difference between Master and Project EIR	Will the city route all above ground electrical/communications lines along existing roadways on the perimeter of the park? There appears to be no description of the difference between a Master EIR and a Project EIR. Will the final EIR contain a clear description of the difference between these two types of EIR?
Page 1-4	Section 3-Levels of Significance	What specific criteria were used to determine the Levels of Significance?

Reference	Description	Comments/Questions
Organization & Content		Do biologists commonly accept these levels or are they established by the City of Pasadena?
Page 1-5 Organization & Content	Section 7-Growth-Inducing Impacts	What was the source of the data used to determine the projections? Are these projections commonly accepted by regional planning organizations or are they based on projections by the City of Pasadena?
Page 1-5 Organization & Content	Section 9-Report Preparation Personnel	<i>Potential Conflict of Interest:</i> It has been reported that members of Sapphos Environmental, Inc. upper management (i.e. Marie Campbell) have family members who are officers in youth sports organizations. What youth sports organizations do preparation personnel and/or their families have membership in, participate in, or to which they hold office?
Page 2-3 Statement of Objectives	Provide for new revenue-generating park facilities.	Granted the maintenance of the parks can be costly, we question whether it's out of place to expect the natural areas of the Arroyo (upper & lower) to be a revenue source. The current Hahamongna Master Plan appears to be a very costly undertaking, thus putting even greater pressure on the need to generate revenue, something that conflicts with a previously stated objective " <i>Achieve restoration/conservation of the natural environment.</i> " What are the revenue-generating park facilities the city's considering for the Hahamongna Basin and the Lower Arroyo?
Page 2-4 2.2.1 Existing Facilities	Hahamongna Watershed Park	The EIR incorrectly states, " <i>Adjacent land uses include public green space (Angeles National Park)...</i> " It should read, <u>Angeles National Forest.</u> No mention is made of La Cañada High School, the County Fire Camp and the La Cañada United Methodist Church.
Page 2-4 2.2.1 Existing Facilities	Hahamongna Watershed Park	The third paragraph is confusing. On one hand you state that one parcel " <i>is zoned as a Planned Development District</i> " and in the next sentence you state, " <i>The entire basin is designated as Open Space in the Land Use Element of the City of Pasadena Comprehensive General Plan.</i> " What is the parcel noted zoned as a Planned Development District? Will the city re-zone this parcel to Open Space?

Reference	Description	Comments/Questions
Page 2-4&5 2.2.3 Existing Facilities	Lower Arroyo Seco	The Draft MEIR incorrectly states, "... were recently restored with naturalized streambeds and native vegetation." Presumably this is the BFI mitigation project that has been poorly maintained and the statement states that the stream has been naturalized, when in fact it is a by-pass watercourse which is off-stream from the historic Arroyo Seco watercourse.
2.3.1.1.1 Master Plan Elements	Hahamongna Watershed Park New Parking Areas	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. What basis was the need established for this new parking area? We would propose that a walk way from road level to the overlook existing area currently accessed through the tunnel be constructed which would allow foot traffic from the dam to cross under Oak Grove Drive. Person wishing to park near this overlook could park on Linda Vista or Oak Grove Drive. USFS has abandoned their facilities on HWP.
2.3.1.2.1 Master Plan Elements	Park Entrance at Foothill	The entrance has adjacent street lighting and the park hours are from sunrise to sunset. Why is lighting necessary?
2.3.1.2.2 Master Plan Elements	Oak Grove Drive Improvements	The "slip-lane" that is proposed to alleviate peak-hour congestion would result in turning the existing low volume park road into a public thoroughfare. It would significantly impact the park-like quality that currently exists.
2.3.1.4	Water Conservation	The document references the 1997-98 storm event " <i>...the basin could have filled 42 times.</i> " Where does this year fall within the water history of this area? Was it more or less than other large storm events?
2.3.1.4.1	Seasonal Flood Management Water Conservation Pool	The primary purpose of the Hahamongna Basin is for flood management. Second to that would be water conservation and habitat. This massive grading project would result in the destruction and fragmentation of the natural habitat. We question the need for what is proposed as well as extensive expenditure to build and maintain. What is the need based on?
2.3.1.4.2	Pump-Back System	We question the need for what is proposed, given the expense it would take to build and maintain. Has the City explored methods for greater utilization of the existing ponds by drilling seepage pipes to allow for the water to get below the current layer of silt?

Reference	Description	Comments/Questions
2.3.2.5	Flood Management Page 2-12	<p>“...water up to the 1,0405.5 foot msl ...” appears to be a typo. On the same line the word “volves” is probably also a typo.</p>
2.3.1.6.10	Expanded Parking Area	<p>We understands that the new storm water runoff regulations may require permeable material to prevent pollution from entering storm drains. 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?</p> <p>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?</p> <p>This is in conflict with the new Storm Water Runoff regulations which specify permeable material so as to retain storm water on site.</p>
2.3.1.7.2	Westside Children’s Play Area	<p>The EIR doesn’t appear to evaluate the impact of both lake features in terms of infrastructure required to keep the feature operating with water. It also doesn’t conform to the naturalization goal. We understand that this feature also will serve as a drain for the areas. The analysis does not analyze the impact of the surface groundwater impacting health issues related to children playing in these areas.</p> <p>When one reads about the east and west lake projects, one wonders why for a lot less expense and infrastructure kids can’t play in a real stream when there is water which is safe to play around.</p>
2.3.1.8	West Lake	<p>Given the City’s concern over water conservation, the stated need for infrastructure and supplementing with city water is not a good lesson for children who live in Southern California to learn. The manufactured lake with proposed “fishing feature” doesn’t conform to the naturalizing objective. We would recommend that the shoreline of the lake be populated with plant life which would prevent water play, but would allow persons to view the wildlife.</p> <p>Page 2-18 states, “For safety reasons, the lake would be designed with a shallow shoreline of a 6:1 gradient.” Pasadena Audubon has concerns that this gradient could result in water warming to the point it would support avian</p>

Reference	Description	Comments/Questions
		<p>botulism. This problem was solved by Whittier Narrows designed their lakes with a 1-foot drop off.</p> <p>We recommend that the lakes be ringed with a plant barrier to minimize human contact with the lake proper but allow observation of the water foul. This could be done so people can look over or through at the wildlife, but keep people from entering the water.</p> <p>Also, this 6:1 slope would encourage persons to wade and play in the water creating possible health risks that would require unnatural mitigation measures.</p> <p>We are also concerned that these lakes would encourage the introduction of domesticated and/or non-native species of fish and reptiles, along with pet ducks. The design should discourage people from dumping their unwanted pets.</p>
2.3.1.9.2	Realign and Widen Access Road	<p>The EIR 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 the existing road has already encroached on the Oak Woodland, any increase in capacity would further endanger the existing oaks. PAS recommends that all paving be removed from roads and replaced with natural permeable material.</p>
2.3.1.11.1 West Arroyo Parking	Construct Parking Structure, Phase Out East Lot.	<p>The EIR fails to adequately evaluate the impact of routing an additional 1200 vehicles to the west side access to JPL. Oak Grove Drive is already having serious traffic problems. Pasadena Audubon recommends that NO structure be built that has Westside access, either on park roads or city streets.</p>
2.3.1.11.2	West Arroyo Inner Park Access	<p>The EIR fails to adequately evaluate the impact or suggest mitigation for the routing an additional 1200 vehicles through the park. Widening the road would seriously impact historic rock walls, riding trails and oak woodlands that currently border the existing road. Additionally, it travels adjacent to an area where children play (Tom Sawyer's Camp.)</p>

Reference	Description	Comments/Questions
3.3.1.12.5 Eastside Park Area	Eastside Children's Play Area	<p>The EIR doesn't appear to evaluate the impact of both lake features in terms of infrastructure required to keep the feature operating with water. We understand that this feature also will serve as a drain for the areas. The analysis does not analyze the impact of the surface groundwater impacting health issues related to children playing in these areas.</p> <p>When one reads about the east and west lake projects, one wonders why for a lot less expense and infrastructure kids can't play in a real stream when there is water which is safe to play around.</p>
2.3.1.12.6	Parking improvements	<p>The EIR fails to adequately evaluate of using asphalt vs. permeable surfaces such as decomposed granite. Pasadena Audubon proposes that all roads/trails on the basin floor be of stable permeable materials or natural materials.</p>
2.3.1.12.7	Interpretive Area & Parking	<p>The EIR 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.</p> <p>The EIR fails to adequately address the impact of the potential traffic congestion to this intersection. What is the basis for providing 2 bus spaces for this area?</p>
2.3.1.13	East Lake	<p>Given the City's concern over water conservation, the stated need for infrastructure and supplementing with city water is not a good lesson for children who live in Southern California to learn.</p> <p>The manufactured lake with proposed "fishing feature" doesn't conform to the naturalizing goal. We would recommend that the shoreline of the lake be populated with plant life which would prevent water play, but would allow persons to view the wildlife.</p> <p>Page 2-18 states, "<i>For safety reasons, the lake would be designed with a shallow shoreline of a 6:1 gradient.</i>" Pasadena Audubon has concerns that this gradient could result in water warming to the point it would support avian botulism. Whittier Narrows designed their lakes with a one-foot drop off solved this problem.</p>

Reference	Description	Comments/Questions
		The EIR states, “When necessary, due to evaporation, treated in-chlorinated water from the VOC water treatment plant would be pumped directly into the east lake to maintain its surface level.” It should be noted that this water diversion reduces groundwater recharge.
2.3.1.15.1	Convert JPL Parking to Public Parking	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 established that 600 places are needed for public parking? Will this “public parking” become off-site parking for Central Arroyo events?
2.3.1.16.1 Trail Development	Perimeter Trail	No mention was made of what the trail surface would be. In keeping with the natural area “look and feel” we recommend that the surface be of a permeable substance such as decomposed granite.
2.3.1.16.4	East Rim Trail	The word “ <i>train</i> ” in the second line of the paragraph appears to be a typo. Perhaps you meant, “trail.”
2.3.1.17	Bicycle Route	The EIR fails to evaluate the impact of paved surfaces on ground water runoff. In keeping with the natural area “look and feel” we recommend that all basin level roads/trails be of a permeable substance such as decomposed granite.
2.3.1.18	Habitat Conservation	In the third line, the EIR appears to have a typo where the parenthetical phrase contains the word “rural”. Did you mean “ruderal”?
Table 2.3.1.18.2-3 Page 2-34	Southern Willow Scrub	The EIR fails to evaluate the impact of the destruction of the 17.8 acres of existing dense area of willows in the basin. It is the sighting of (possible migrating) Least Bell’s vireo observed in 8/93. Least Bell’s vireos are known to nest in this type of habitat. “The least Bell’s vireo, (<i>Vireo bellii pusillus</i>), is a federally listed endangered species sensitive to changes in riparian vegetation.”
2.3.4.2 Lower Arroyo	Enhance Main Park Entrance	The table incorrectly states, “ <i>habitat lost due to inundation (water conservation)</i> ” Better to state, “ <i>habitat will be destroyed through the grading of 312,000 cubic yards of grading to construct a conservation pool.</i> ”
2.3.4.2.3	Improved Entry Landscape & Lighting	This area has been designated as a Natural Area. It has an existing historical character with a limited access road. Further development beyond the present will impact the natural feel. On what basis does the City feel it must improve and enhance this area?
2.3.4.2.4	Widen Access Road to Standard width of 24 feet	How was the need established for lighting since this area’s hours are limited from sunrise to sunset? How was the need established widening the access road? Currently, bicycles are banned from the lower arroyo, and there is significant public opposition to

Reference	Description	Comments/Questions
2.3.4.3	New South Entrance	<p>the Westside bike path. Additionally, given the limited parking in the area, what is the need to widen a road that would require hillside retaining walls on both sides of the road. Both avenues would impact the look & feel of this historic natural area.</p> <p>The proposed new road would create an intersection on a road that is currently dangerous due to speeding southbound traffic, which use the road to access the Arroyo Parkway. The grading of the new road and its 24' width would virtually destroy the natural feel of the hillside. What was the need for this project based on? Has the City considered not building the new road and trading some of the existing city land (where vehicles are parked in spite of posting prohibiting parking) for an easement to build the road through the existing stable lot?</p>
2.3.4.3.1	20 Parking Spaces	<p>On what basis was the need for this project established?</p> <p>Currently the dirt area is used by park visitors who access it through the stables (City of South Pasadena's lease holder)</p>
2.3.4.5	Enhance Bird Sanctuary	<p>The EIR fails to define the "enhancements" to this area. Greater specificity needs to adequately determine environmental impact.</p>
2.3.4.9	Bridge Crossing at Archer's Clubhouse	<p>The EIR states, "<i>The remaining 15-foot gap would allow for hikers, walkers, and cyclists to cross the bridge.</i>" Currently, bicycles are banned from the Lower Arroyo, and the EIR fails to indicate that there is significant public opposition to the Westside bike path.</p>
2.3.4.10	Improve Westside Multi-Use Trail Access at Parker-Mayberry Bridge	<p>On what basis was the need for this project established? Currently, bicycles are banned from the lower arroyo, and there is significant public opposition to the bikes in the arroyo.</p>
2.3.4.11 Page 2-59	Westside Multi-Use Trail for Bicyclists and Hikers	<p>Currently, bicycles are banned from the Lower Arroyo, and there is significant public opposition to the bikes in the Arroyo.</p> <p>The EIR fails to adequately address the public controversy over the Westside bike trail. The existing Westside trail narrows to 8' or less at two places. The EIR fails to adequately describe the amount of grading and retaining walls required. Most importantly, the City's proposal to mitigate potential dangerous congestion at these choke points with signage is at best paltry. There is no</p>

Reference	Description	Comments/Questions
		<p>indication as to how the posted rules will be enforced.</p> <p>Also, the EIR doesn't adequately address the impact the trail modifications will have on the excellent Westside habitat.</p>
2.3.4.12.3	Provide Rest Areas	<p>The EIR fails to adequately describe where the 92,000 square feet of brush clearing and the destruction of natural habitat are to occur. This area is where a California Gnatcatcher (an endangered species) was observed in 6/2001.</p>
2.3.4.14	Install New Pedestrian Bridge	<p>This project appears to be mislabeled since 10,000-pound vehicles, which are significantly larger than a standard pick-up truck, will also use this bridge.</p> <p>The EIR fails to adequately describe the additional infrastructure for this bridge (areas necessary to turn these large vehicles to go across the bridge, etc.) impact this project will have on this part of the Lower Arroyo Natural Area and natural habitats.</p> <p>On what basis was the need for this project established? Is it because the city already has set aside grant money to construct the bridge?</p>
2.3.4.15	Westside Pedestrian Trail	<p>The EIR fails to discuss and adequately describe the impact of the multiple projects on the east and west sides of this natural area.</p> <p>On what basis was the need for this project established? There is an existing trail already in place that is quite natural. Why is it necessary to place the trail further into the hillside habitat when the trail along the edge of the channel currently exists?</p>
2.3.4.15.2	Provide Signage for "Range in Use"	<p>This statement is very unclear. It appears that with the proposed bike and walking trails proposed for the Westside, signage is the only mitigation proposed 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 and how it will be enforced.</p> <p>What is "compacted Class II base material?"</p>
2.3.4.15.3	Landscape to Blend with Surrounding Habitat Restoration Project	<p>What 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?</p>

Reference	Description	Comments/Questions
2.3.4.16.1	Restore Arroyo Boulevard Rim Trail	<p>The EIR 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? The surface would be adequate for ADA accessible devices but would discourage bicyclists, skateboarders and roller bladers.</p> <p>No mention was made as to how the “Pedestrians Only” stipulation will be enforced. The EIR fails to note that there is a sidewalk on the other side of the street.</p>
2.3.4.18	Memorial Grove Restoration	<p>The EIR does state, “<i>The area has not been well maintained over time.</i>” The EIR fails to state how this “restored” area is to be maintained.</p>
2.3.4.18.2	Create an Open Natural Area	<p>The EIR fails to identify the area where “60,000 square feet of brush clearance” and destruction of existing natural habitat of will occur. This area is where a California Gnatcatcher (an endangered species) was seen in 6/2001.</p>
2.5	Related Projects	<p>All are located outside the Arroyo Seco proper; the majority is over ¼ to ½ mile away. Why were these projects included in this MEIR? Why are some of the projects listed within the City of La Cañada-Flintridge?</p> <p>The EIR fails to explain how these projects are related to the Arroyo Seco Master Plan EIR.</p>
3.1.4.1.1 Hahamonga Watershed Park Impact Analysis	Significant Impacts	<p>There appears to be a typo in the last paragraph on page 3.1-6 where it states, “... <i>would replace existing surface parking lots with a six-level parking structure capable of accommodating the existing 1,700 parking spaces.</i>” This implies that the replacement structure will accommodate 1,700 vehicles. Is 1,700 a correct figure?</p> <p>The EIR fails to adequately describe the impact of the 1200 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.</p>

Reference	Description	Comments/Questions
		<p>The EIR fails to adequately describe the impact of the grading of 430,000 cubic yards to resculp 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.</p> <p>The EIR 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.</p> <p>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.</p>
3.1.4.1.2 Page 3.1-7	Issues Found Not to Be Significant	<p>We disagree with the EIR 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. Why will this NOT have a significant impact?</p>
3.1.5 Mitigation Measures`	Measure Aesthetic - 5	<p>The proposed mitigation measures, “<i>would be composed of a combination of partial burial or berming of the structure, vegetative treatment...</i>” would further encroach on existing natural areas and would increase the existing footprint of the structure. It is hard to see how a pile of dirt and vegetation could hide a 40-60 foot parking structure. We feel that this mitigation measure does further damage to the surrounding habitat. Will this mitigation increase the “foot print” of the project? If so, how much more of the parkland will be impacted by this mitigation measure?</p>
3.1.6	Level of Significance after Mitigation	<p>We heartily agree with the EIR statement, “<i>However, due to the potential height of the structure and it’s propensity to be visible from numerous public views, it is anticipated that the structure’s impact on the aesthetics would remain significant after mitigation.</i>”</p> <p>We also feel that the proposed structure would significantly impact the aesthetics of the park atmosphere by the routing of structure traffic through the park.</p>

Reference	Description	Comments/Questions
3.2.4 Impact Analysis Construction Impacts	Equipment Page 3.2.16	The EIR states, “ <i>The analysis assumes there would be three dozers operating an average of four hours a day and ...</i> ” This assumption appears unrealistic considering the scope of the project and the economic realities of operating large equipment. On what basis is this assumption made? How will the City monitor and enforce this assumption?
3.2.4 Impact Analysis Construction Impacts	Trucks Page 3.2.16	This is a very unclear statement. Are all these trips to be made in the Hahamongna basin or will they be between the Upper and Lower Arroyo areas? What projects in the Lower Arroyo require importation of sediment?
3.2.5 Mitigation Measures	Measure Air-11	How will the City monitor and enforce the 15-minute turn-off requirement? What penalties will be imposed should this requirement not be met?
3.3.1 Biological Resources	Page 3.3-5 Draft Tree Protection Amendment	Spelling error: (<i>Quercus engelmannii</i>) should read <u>engelmanni</u>
3.3.2.1 Biological Resources Plant Communities	Southern Willow Scrub	The EIR fails to note that the majority of this habitat in the Hahamongna basin is good quality consolidated habitat.
3.3.2.1 Biological Resources Plant Communities	Riversidean Alluvial Fan Sage Scrub Page 3.3-8	Page 16 of the Parson’s Final Draft Biological Technical Report, Hahamongna states, “ <i>Riversidean alluvial fan sage scrub is considered a sensitive habitat by California state regulatory agencies due to declining habitats lost to urban development and flood control.</i> ” We find no mitigation measure in the ASMEIR for protecting this sensitive habitat. In fact, the perimeter road will bring increased human incursion into this area. Will the City make a significant effort to protect this habitat?
3.3.2.1 Plant Communities	Landsaped Vegetation Page 3.3-9	Poor use and misuse of scientific names: Ex: The “Olive” is <i>Olea europea</i> , the only one in our area. Same for most others; Spp. Is plural for species and implies there are multiple species in the area; Liguidambar: Hamamelidaceae is a Family not a genus.

Reference	Description	Comments/Questions
3.3.2.3 Wildlife	Birds Page 3.3.27	<p>No mention of the sighting of a Least Bell's vireo by Tracey Alsobrook in 8/93. Least Bell's vireos are known to nest in this type of habitat. <i>"The least Bell's (Vireo bellii pusillus), is a federally listed endangered species sensitive to changes in riparian vegetation."</i></p> <p>It is our understanding that the surveying agency was provided a bird list for the Hahamongna Area prior to their conducting the study. No reference is made to this in the EIR. Also no reference is made to consulting Kimball Garrett of the Museum of Natural History regarding any historical findings in the Hahamongna basin.</p> <p>Did a respected experienced birder or general naturalist conduct the study?</p> <p>The statement incorrectly states "Mr. Mickey Long of Eaton Canyon Nature center last observed a listed species (mountain yellow-legged frog) in 1979." In fact it was actually recorded November 7, 1976.</p>
3.3.2.3 Existing Conditions Wildlife	Reptiles & Amphibians Page 3.3-27	
Table 3.3.2.3-1 Listed and Sensitive Wildlife species potentially occurring in the Arroyo Seco Area	Orange Throated whiptail	<p>The EIR incorrectly states, <i>"Range includes the southwestern edge of Los Angeles county, southwestern San Bernardino, Orange, Riverside, and San Diego Counties. Nearest known occurrence was in 1988 located in the Tujunga Wash approximately 11 miles northwest of the project site."</i> There are no records from the San Gabriel Mountains or Tujunga Wash. (source, Mickey Long)</p> <p>This is not the correct scientific name.</p> <p>Also the EIR incorrectly states, <i>"Occurs coastally in the southern Los Angeles County, Orange, Riverside, and San Diego Counties. Nearest known occurrence was in 2000 located in the Santa Monica Mountains."</i> This species regularly occurs in the SG Mts. including Hahamongna and Eaton Canyon. (source, Mickey Long)</p>
Table 3.3.2.3-1 Listed and Sensitive Wildlife species potentially occurring in the Arroyo Seco Area	Coastal western whiptail (<i>Cnemidophorus hyperythrus</i>)	

Reference	Description	Comments/Questions
Table 3.3.2.3-1 Listed and Sensitive Wildlife species potentially occurring in the Arroyo Seco Area	Cooper's Hawk (<i>Accipiter cooperii</i>) nesting	The EIR incorrectly states, " <i>Known from throughout southern California. Nearest occurrence was in 1921 located in Palmdale, Los Angeles County.</i> " This species regularly nests in San Gabriel Foothills (source, Mickey Long) The species is reported regularly (yearly) in the Arroyo Seco.
Biological Resources	Birds Page 3.3.27	The Pasadena Audubon Society provided their bird list for Hahamongna and the Arroyo Seco to Parsons. The comments do not reference the list that has listed other sensitive species sighted in the area.
3.3.4.1.1 Biological Impacts	Significant Impacts	Did the surveyors use this bird list during their survey? If not, why not? The EIR fails to note that most of the existing consolidated willows habitat in the basin will be destroyed and replaced with fragmented plantings of willows interspersed with active recreation activities. Much of the mitigation measures noted in this EIR for the southern willow scrub and mule fat scrub are fragmented (landscaping) and not good consolidated habitat that attract or sustain wildlife.
3.3.4.1.2	Issues Found Not to be Significant Page 3.3-29	What basis of the statement, "Grading activities (340,000 cubic yards) ...however, the proposed restoration projects within the Hahamongna Watershed Park would reduce the impacts to below the level of significance...?" In fact, the replacement habitat is poor quality fragmented habitat that is used for landscaping and not for wildlife.
3.3.4.1.2	Issues Found Not to be Significant Page 3.3-30	The Hahamongna WP Master Plan will significantly increase human presence and bring increased traffic into the basin. With that in mind, it will significantly impact existing wildlife corridors through the basin.
3.3.4.3.2 Lower Arroyo Seco Master Plan	Issues Found Not to be Significant	The Lower Arroyo Master Plan will significantly increase human presence and bring increased traffic into this natural area. This increased human presence will impact existing wildlife corridors through this narrow area.

Reference	Description	Comments/Questions
3.5.4 Impact Analysis	Table 3.5-5 Page 3.5-18	The report notes that the Conservation Pool will have Impermeable Liner Design. Is the “X” mark in the chart 3.54 correct? If it is correct and the conservation pool will be lined, then what is the basis for the liner? Why not leave it unlined and allow water to refresh the existing underground aquifer?
3.6.4.1.1 Hahamongna Watershed Park	Significant Impacts P3.6-7	Since the Master Plan proposes grading the conservation pool to a depth of 990 and much of the pool area will be graded below 1040.5 msl, what type of mitigation measures will be considered? And what additional impact will these measures have on the surrounding habitat?
3.7.4.1 Impact Analysis Hydrology & Water Quality	Hahamongna Watershed Park Master Plan Water Quality Impact Analysis Page 3.7-9	The EIR fails to clearly specify what mitigation measures would be used to reduce the impacts below the “ <i>level of significance.</i> ” Was the “level of significance” for water quality determined by the City or the Regional Water Quality Board?
3.7.5 Mitigation Measures	Measure Hydro-1 Page 3.7-11	The EIR states, “ <i>Parking lots to be constructed within the floodplain may use pervious surfaces to increase infiltration and provide a runoff filtration system.</i> ” Pasadena Audubon would prefer that all roads, trails, paths, parking lots on the floor of the Hahamongna basin be of permeable material and that all existing asphalt be removed. The EIR fails to mention how any toxic substances from vehicles will be dealt with prior to it entering the surface and contaminating the groundwater. The EIR states, “ <i>Frequent site maintenance shall be conducted to ensure that protect BMPs are functioning as intended.</i> ” In light of the city’s limited resources to maintain the existing park, how does the city plan to fund these additional responsibilities?
3.9.4.1.2.1 Impact Analysis Noise	Expand Oak Grove Field Parking Area Page 3.9-10	The EIR fails to state in understandable terms what an increase of 3dB means. It is our understanding that 3dB increase would double the level of sound. Therefore a 5dB increase would mean that the sound levels would more than triple the current levels. This increase would significantly impact the wildlife habitat and the natural setting.

Reference	Description	Comments/Questions
3.11.4.1.2 Impact Analysis Recreation	Issues Found Not to be Significant Page 3.11-5	The EIR fails to state the impact the 1200-space parking structure would have, not only during but also after construction, on the equestrian activities and trails adjacent to the proposed structure.
3.11.4.3.2 Impact Analysis Lower Arroyo	Issues Found Not to be Significant Page 3.11-7	We disagree with the statement. Lighting, additional parking, would significantly impact this natural area. We question the need for additional lighting since this area's hours are from sunrise to sunset.
3.12.2 Existing Conditions	Windsor Ave Page 3.12-5	<u>Error of fact:</u> Altadena is not a city, but an unincorporated area of the County.
Figure 3.12.2-5	Existing Traffic Volumes Weekday AM Peak Hour	The figures noted on the chart do not correctly reflect the traffic volume that the City is stating as a justification for using the Oak Grove Park road to drop off students for La Cañada High School.
Figure 3.12.2-6	Existing Traffic Volumes Weekday PM Peak Hour	The figures noted on the chart do not correctly reflect the traffic volume that the City is stating as a justification for using the Oak Grove Park road to drop off students for La Cañada High School.
Figures 3.12.2-12	Existing Daily Traffic Volumes- Weekend Special Event No. 1	We question the figures for Oak Grove Drive and Windsor Ave. The volumes seem to be high, considering JPL and the La Cañada High School are not in session.
Page 3.12-15 Related Projects Page 3.12-27 & 28	Figure 3.12.2-14 Tables: 3.12.4-1 & 3.12.4-2	What is the reason for using these related projects as a basis for the trip generation traffic analysis? The MEIR lists only Sycamore Grove field in both these tables. No mention is made of Oak Grove Field. Where is the Oak Grove Field Trip Generation data to be found? If it was not included in this report, then this table is misleading since it does not include the total projected number of trips that would be generated for the Westside Fields and Disk Golf.
Page 3.12-46	Street Segment No. 10: Oak Grove Drive south of Foothill Blvd.	How was this figured arrived at? We question the traffic volume estimates for Weekend Special Events being 24% below weekday figures (13,400). How can it be -24% when both JPL and La Cañada High School are not in full operation?
3.12.5 Mitigation Measures	Measure Transportation-3	The EIR fails to include the impact of access and egress to the new parking lot planned for this area. Will the city allow this small parking area to be used during Special Event days?
3.13.5 Mitigation Measures Table 4.0-1	Measure Utilities and Service Systems- 1,2,3,4, Page 4-2, Item 3	Will the routing of all underground services be under existing roadways and not through existing habitat? We disagree with the MEIR's No Project alternative answer of NO. The basin is

Reference	Description	Comments/Questions
Summary of Proposed Project and Alternatives' ability to attain project objectives	Achieve restoration/conservation of natural environment.	already habitat for wildlife and the Master Plan will destroy the existing high-quality consolidated habit and replace it with low-quality fragmented habitat
Table 4.0-1 Summary of Proposed Project and Alternatives' ability to attain project objectives	Page 4-2, Item 7 Optimize water conservation in the Arroyo Seco to serve City of Pasadena enterprises and residents	We disagree with the MEIR's No Project alternative answer of NO. The existing water conservation spreading basins as well as the proposed basins are not very effective and require significant maintenance to keep them functioning. We feel that more effective water conservation would occur by using the complete basin.
Table 4.0-1 Summary of Proposed Project and Alternatives' ability to attain project objectives	Page 4-3, Item 11 Update the Arroyo Seco Public Lands Ordinance	We disagree with the MEIR's No Project alternative answer of NO. We would like to see the Arroyo Seco Ordinance apply to all areas included in the Master Plan. That the ordinance limit the size and scope of events permitted in the natural areas of the Upper and Lower Arroyo so as to keep the area as natural as possible.
Table 4.0-1 Summary of Proposed Project and Alternatives' ability to attain project objectives	Page 4-3, Item 15 Provide for new revenue-generating park facilities	<p>What specific kind of revenue-generating facilities or events does the city plan on developing in the Hahamongna basin?</p> <p>We would like to see the Arroyo Seco Ordinance apply to all areas included in the Master Plan. That the ordinance limit the size and scope of events permitted in the natural areas of the Upper and Lower Arroyo so as to keep the area so as to it as natural as possible.</p>
Section 8.0 Organizations & Persons Consulted	Page 11-14	Remove "+A17" from the name line.

Pasadena Audubon Society Detailed Comments
Draft Master Environmental Impact Report (Volume 2) - #2000091062
May 16, 2002

Reference	Description	Comments/Questions
Appendix A	Notice of Preparation and Comment Letters	<p>In reviewing the letters contained in this appendix, it has become apparent that many if not most of the comments made by the individuals and organizations raised concerning potential environmental impacts were not addressed in the current Master Plan and Draft MEIR.</p> <p>We find none of the issues raised by the Pasadena Audubon Society's letter of October 11, 2000 were incorporated in the current plan.</p> <p>Additionally, the current MEIR does not address environmental impacts raised in the letters from the California Department of Fish and Game (i.e., items 2, 3, 5); Arroyo Seco Foundation (i.e., ASF Watershed Study mitigation proposals for stream restoration, the need for greater specificity of project descriptions); JPL Memo of Record (where it notes, "The conclusions presented in the narrative are not basis in facts and indicate that the City of Pasadena has not adequately reviewed the data generated by NASA regarding the JPL Superfund site or the JPL site's impact on the Upper Arroyo"; JPL's disagreement with the "Less than Significant Impact" determinations for the following checklist sections 2.4d,f,g, 2.9c, and 2.15a,b,e,f; "impacts on riparian habitat and sensitive natural communities due to the proposed grading plan"</p> <p>It is clear that the city has disregarded public and agency comment by not including issues raised by the comments into their Draft MEIR for the Arroyo Seco.</p>
Appendix C Biological Resources Reports-Hahamongna Watershed Park Prepared by Parsons Engineering	4.2.1.1 Page 12 4.2.1.2 Page 15 4.2.1.3 Page 16	<p>The report fails to indicate the number of acres of this type in the park. What are the numbers of acres of this type that are in the park?</p> <p>The report fails to indicate the number of acres of this type in the park. What are the numbers of acres of this type that are in the park?</p> <p>The report fails to indicate the number of acres of this type in the park. What are the numbers of acres of this type that are in the park?</p>

Reference	Description	Comments/Questions
4.2.1.4 Page 17		<p>The report fails to indicate the number of acres of this type in the park. What are the numbers of acres of this type that are in the park?</p> <p>Also, page 16 of the Parson's Final Draft Biological Technical Report, Hahamongna states, " <i>Riversidean alluvial fan sage scrub is considered a sensitive habitat by California state regulatory agencies due to declining habitats lost to urban development and flood control.</i>"</p>
4.2.1.5 Page 18		<p>We find no mitigation measure in the ASMEIR for protecting this sensitive habitat. In fact, the perimeter road will bring increased human incursion into this area. Will the City make a significant effort to protect this habitat?</p>
4.2.1.6 Page 19		<p>The report fails to indicate the number of acres of this type in the park. What are the numbers of acres of this type that are in the park?</p>
4.2.1.7 Page 20		<p>The report fails to indicate the number of acres of this type in the park. What are the numbers of acres of this type that are in the park?</p>
4.2.1.8 Page 21		<p>The report fails to indicate the number of acres of this type in the park. What are the numbers of acres of this type that are in the park?</p>
4.2.1.9 Page 22		<p>The report fails to indicate the number of acres of this type in the park. What are the numbers of acres of this type that are in the park?</p>
4.2.1.10 Page 22		<p>The report fails to indicate the number of acres of this type in the park. What are the numbers of acres of this type that are in the park?</p>
Table 4.1 Birds Least Bell's Vireo		<p>Pasadena Audubon Society provided a bird list for the Arroyo Seco sightings to Parsons prior to their field studies. The comments fail to include a previous sighting by Tracey Alsobrook (8/93) in the southern willows habitat just to the west of Devil's Gate Dam and north of Flint Wash. Also, Dan Cooper's sightings of the California Gnatcatcher in 6/2001 near Camel's Hump in the Lower Arroyo.</p>
Table 4.1 Birds Cooper's hawk		<p>The report incorrectly states, "<i>It is not recorded for the Pasadena or any of the eight surrounding quadrangles.</i>"</p>
		<p>This species regularly nests in San Gabriel Foothills and Santa Fe Dam, Irwindale, CA ten miles east of the site (source, Mickey Long) and is reported regularly (yearly) in the Arroyo Seco.</p>

Reference	Description	Comments/Questions
	<p>5.10.2 Recommendations Page 85</p>	<p>EIR states that <i>Philip Williams & Associates</i> had cooperative and informative input to the habitat restoration plan. Please cite where in the plan were their comments incorporated in the habitat restoration plan.</p> <p>It is our understanding that city staff rejected this study. If so, what were the specific reasons for dismissing the study?</p> <p>What is the basis for the city stating that using willows as a landscaping feature is a reasonable restoration of the original consolidated willows habitat?</p> <p>Currently, the basin has over 40 acres of good quality consolidated willows habitat.</p> <p>This statement is misleading. The 300,000+ cubic yards of grading required to create the conservation pool and will destroy high-quality consolidated willows habitat in the southern Hahamongna basin.</p>
<p>Draft Biological Technical Report- Central Arroyo Prepared by Parsons Engineering</p>	<p>Table 3.1 Listed sensitive species found in the Central Arroyo -Birds</p>	<p>The comments fail to note that <i>Accipiter cooperii</i> (nesting) this species regularly nests in San Gabriel Foothills and Santa Fe Dam, Irwindale, CA ten miles east of the site (source, Mickey Long)</p> <p>The Pasadena Audubon Society provided their bird list for Hahamongna and the Arroyo Seco to Parsons. The comments do not reference the list that has listed other sensitive species sighted in the area.</p> <p>Did the surveyors use this bird list during their survey? If not, why not?</p>
<p>Draft Biological Technical Report- Lower Arroyo Prepared by Parsons Engineering</p>	<p>Table 3.1 Listed sensitive species found in the Lower Arroyo -Birds</p>	<p>The comments fail to note that <i>Accipiter cooperii</i> (nesting) this species regularly nests in San Gabriel Foothills and Santa Fe Dam, Irwindale, CA ten miles east of the site (source, Mickey Long)</p> <p>The Pasadena Audubon Society provided their bird list for Hahamongna and the Arroyo Seco to Parsons. The comments do not reference the list that has listed other sensitive species sighted in the area.</p> <p>Did the surveyors use this bird list during their survey? If not, why not?</p>

Reference	Description	Comments/Questions																		
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Appendix F Traffic Impact Study Prepared by Linscott, et al.	Page 120	<p>Did the surveyors use this bird list during their survey? If not, why not?</p> <p>The report states, “The assessment included a comparison between the existing shuttle route and an alternate route ... and reviewed the integration of off-site parking within the Upper Arroyo Seco (i.e. within the Hahamongna Watershed Park) ...”</p> <p>Does the city intend to use the upper arroyo as an off-site parking for large events held in Pasadena?</p>																		
Appendix F Traffic Impact Study Prepared by Linscott, et al.	Appendices	<p>The appendices noted on the last page of the Linscott report are not included with the report (page notes that the appendices are under separate cover however they were not contained in Volume 2). The city did provide a copy of the appendices. An outline of their contents is noted below.</p> <table border="0" data-bbox="889 317 1036 1188"> <tr> <td>Appendix A</td> <td>Manual Traffic Counts</td> </tr> <tr> <td>A-1</td> <td>Weekday AM/PM Peak Periods</td> </tr> <tr> <td>A-2</td> <td>Weekend Special Event 1 (Arrival/Departure)</td> </tr> <tr> <td>A-3</td> <td>Weekend Special Event 2 (Arrival/Departure)</td> </tr> </table> <table border="0" data-bbox="1068 611 1328 1188"> <tr> <td>Appendix B</td> <td>24 hour traffic Counts</td> </tr> <tr> <td>B-1</td> <td>Weekday Oak Grove/Berkshire Windsor/S. Mountain</td> </tr> <tr> <td>B-2</td> <td>Weekend Special Event 1</td> </tr> <tr> <td>B-3</td> <td>Weekend Special Event 2 No Oak Grove or Windsor</td> </tr> </table> <table border="0" data-bbox="1365 306 1438 1188"> <tr> <td>Appendix C</td> <td>Project Trip Zone A – Upper Arroyo Distribution %/maps</td> </tr> </table>	Appendix A	Manual Traffic Counts	A-1	Weekday AM/PM Peak Periods	A-2	Weekend Special Event 1 (Arrival/Departure)	A-3	Weekend Special Event 2 (Arrival/Departure)	Appendix B	24 hour traffic Counts	B-1	Weekday Oak Grove/Berkshire Windsor/S. Mountain	B-2	Weekend Special Event 1	B-3	Weekend Special Event 2 No Oak Grove or Windsor	Appendix C	Project Trip Zone A – Upper Arroyo Distribution %/maps
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		<p>Appendix D Levels of Service Explanation</p> <p>Appendix E-1 Weekday AM/PM Peak Hrs Foothill & 210/Crown Oak Grove Dr Berkshire Ventura/Woodbury</p> <p>E-2 Weekend Special Event 1 E-3 Weekend Special Event 2</p> <p>Appendix F HCS Data Worksheets F-1 Existing Conditions-Weekday AM/PM Peak-Stop</p> <p>Control Analysis F-2 Existing Conditions-Weekend Special Event 1-AM/PM</p> <p>Arrival/Departure F-3 Existing Conditions-weekend Special Event 2-M/PM</p> <p>Arrival/Departure F-4 (Missing) F-5 Year 2010 Project-Weekend Special Event 1 F-6 Year 2010 Project-Weekend Special Event 2 F-7 Year 2010 with projection-weekdays F-8 Year 2010 with projection-Special Event 1 F-9 Year 2010 with projection-Special Event 2</p> <p>Appendix G Assessment of Central Arroyo Master Plan Travel Demand Management Strategies</p>

Pasadena Audubon Society Comments
Arroyo Seco Master Plan
May 16, 2002

- Pasadena Audubon Society (PAS) would like to see a less developed, more natural areas in both the Upper and Lower Arroyo, where mobility is human and animal based, where habitat is not manufactured, where vehicles are kept to an absolute minimum and limited to areas near the edges of the area. Making it easy for people to drive *into nature* instead of *walking in nature* does not create a natural area is not a good way to experience the natural world. There are very few areas in Southern California where people can walk in a reasonably flat terrain in a natural setting. To develop a park space, with its entire infrastructure can only increase the sense of congestion and reduce natural habitat. Nature manufactured by humans, is not nature.
- The ASMP raises many questions about the use of the word *habitat*. On one hand, it refers to existing consolidated habitat as habitat, while later it refers to an area with active recreation and vehicular traffic that has been landscaped with native flora also as habitat. In the first instance, the habitat is for critters, in the latter, the habitat is for humans.
- Much concern is focused on habitat for sensitive and endangered species. However, not much concern is expressed over native and migrating wildlife. Every effort should be made to prevent the further reduction of quality consolidated habitat.
- It is understood that the presence of the Devil’s Gate Dam significantly impacts the natural hydrologic process. Regardless of the dam, significant storm events will bring with it erosion. In some instances, great damage will occur. Building a complex and expensive infrastructure in the flood plan seems very risky at best. Hahamongna means, “flowing water, fruitful valley,” but what has been designed is land of basins waiting for water to be pumped back. PAS would like to see the basin as a whole used for groundwater recharge. A basin, which will require more eco-friendly periodic sediment and debris removal without too much disruption of the natural processes. We would like to see a basin similar to Prado Dam, Hansen Dam, and Sepulveda Basin.

Reference	Description	Comments/Questions
ES-13	Bicycles and Off-leash dogs	We support keeping bicycles and off-leash dogs out of the natural areas. The nature of bicycling today has changed to a more aggressive rider whose riding style is faster and more adventuresome, putting foot traffic at a greater risk for accidents. Off-leash dogs tend to roam into wildlife habitat, scaring or damaging their homes or killing their offspring. With the off-leash animals free to roam, owners are not fully aware of when their pets defecate and therefore will not pick it up.
ES-13	Arroyo Seco Ordinance	PAS would like to see the Arroyo Seco Ordinance applies to all areas of the Arroyo and that the upper and lower Arroyo be designated as natural areas.
ES-14	Goal #6	We would also like to see events be limited as to type and size, and all commercial events, such as fairs, circuses, bicycle racing be prohibited. Typo, the word “environmental” should read environment.

	Goal #7 & 8	Both of these are nice sounding eco-friendly goals which open the way to greater park development and infrastructure. We would prefer less infrastructure and more nature.
	Widen Access Road to 24'	Roads should be used to reduce vehicular traffic not enable more traffic. Narrow roads slow down traffic and allow people the opportunity to practice courtesy and civility.
ES-15	Entry Landscaping and Entry Lighting Bird Sanctuary Lighting	Park hours are from sunrise to sunset. Keep lighting to a minimum to allow wildlife a chance to move freely No lighting so as to allow wildlife a chance to move freely. Bird watching is done during daylight hours, except when looking for owls and other nocturnal birds.
ES-16	Provide picnic area with 6 parking spaces Westside multi-use trail for bicyclists and hikers Study Geological Stability of Camel's Hump area Westside Pedestrian Trail	The location of this picnic area is not designated other than the Lower Arroyo. Why the additional six spaces since parking area already exists? Bicycle should be kept out of the Lower Arroyo. The Westside trail has several areas where it narrows to under 8 feet. The nature of today's bicyclist does not mesh with foot traffic. The all-weather surface should be permeable and natural. Vehicles using this area can be ATV style vehicles. Efforts to stabilize this area would impact any effort to naturalize the channel. Recommend a more naturalized space, which includes erosion, which is a natural process.
ES-18	Provide signage. Criteria for Review	Why is this a separate item from Westside multi-use trail for bicyclists and hikers noted above? Who is responsible for putting up the signage? What is to prevent bicyclists from riding through the range during non-archery hours? How will it be enforced? We recommend that any and all structures built in the Arroyo be approved by City Council.
ES-19	Major Components of the Guidelines	Habitat Restoration: The ASMP states, " <i>The conservation, preservation and restoration of open spaces areas with the Arroyo Seco is the cornerstone of the Arroyo Seco. The guidelines will seek to ensure that natural areas are carefully restored and conserved in perpetuity.</i> " PAS agrees with this statement, however much of the Master Plan projects bring more infrastructure and traffic into the natural areas. The natural areas are becoming more like urban parks than natural areas.

ES-20		<p>Recreation: It is hard to see how integrating more active recreation activities into natural areas keeps the natural areas natural. Passive recreation is more in keeping with keeping the area natural.</p> <p>Walls, Fences and Gates: The use of crib walls is not in keeping with the current historic river-stone look and feel. Fences and gates are not traditional and create visual and wildlife barriers.</p>
ES-21		<p>Site furnishings: Natural Area hours are from sunrise to sunset, therefore exterior lighting in natural areas should be kept to an absolute minimum; interior lighting should be dampened as much as possible. Picnic shelters and camping areas should remain unlit. This will help wildlife move about.</p>
1-10	Parking	<p>PAS prefers that all responsibility for parking be given over to JPL and the City get out of the parking business. We understand that JPL has had a parking structure designed, but NASA has resisted building it. Given the new post-September 11 security consciousness, it would see prudent that JPL have full control of the parking. There appears to be sufficient space on-lab to locate a parking structure.</p> <p>The statement, “Ensure adequate parking...” seems to be based on the assumption that people need to park very close to their destination. The natural areas won’t remain natural if more parking encourages more vehicles. Parking areas should be kept on the edges.</p> <p>PAS recommends that all roads, trails, and paths be composed of natural pervious materials, such as decomposed granite. During major storm events, the natural areas should be closed to only foot traffic.</p> <p>If the park is <i>manufactured nature</i>, it’s hard to see how people learn about <i>real nature</i>.</p>
1-13	5.6 Nature Programs	
2-4	2.2 Zoning & Land Use	<p>PAS understands that the NE parking lot used by JPL was a temporary arrangement. Did the conditional use permit, specify a time limit? Has JPL been approached to build their own parking structure on JPL land?</p>
2-7	The Biological Environment	<p>What is the period of the Historical Records? (See also comments below under B-11.)</p>

2-12	Paragraph 4: “Southern willow scrub ... <i>this community is abundant in the central riparian area and...provides valuable cover for wildlife...</i> ”	We agree and hope that no destruction of the existing habitat occurs. It is clear that the willow habitat can stand inundation. Destruction due to flooding would not destroy the habitat. Efforts to restore this habitat by destroying the existing consolidated habitat and replacing it with fragmented habitat landscaped around active recreation is not restoration, but landscaping.
2-13	Paragraph 1 “Southern Willow scrub in HWP is comprised of well-established, native wetland habitats that are important for wildlife...”	We agree, please see that it is preserved.
2-22	Sensitive Habitat and Special Status Species	This section does not note the endangered species that have been recorded in the area, specifically, Arroyo Southwestern Toad, Least Bell’s Vireo. Nor does it acknowledge that this area is utilized by migrating species.
2-26	Sediment Delivery & Management	Sediment removal is a reality when rivers are dammed. Given the estimated 145,000 cubic yard average, wouldn’t it be more prudent to have it removed annually; thus the removal process would be more efficient than doing the removal after a 3-5 year period.
2-28	2.6 Paragraph 4: “The City of Pasadena has a historic (adjudicated) right to divert up to 25cfs for the domestic water supply.”	This seems to be the basis of the elaborate plumbing system proposed for the Hahamongna Watershed Park. Staff has indicated that the spreading basins are the only way to really keep track of this amount. We find this puzzling since it is relatively easy to set up a gauging station to measure the flow entering the basin and the flow leaving the basin. The difference less evaporation is what enters the basin. To the best of our knowledge, the water leaving the dam passes on to the sea and that there are no other spreading basins below Devil’s Gate Dam. Therefore, why not keep as much water as possible in the basin, letting only water leave the basin for Central and Lower Arroyo stream naturalization. This would benefit all the members of the basin.
2-30	Stream Flows Paragraph 3:	The statement, “Prior to...it was observed...continual buildup of excessive fines...” is not an exception but the rule and therefore it is to be expected. Why did the Philip Williams Study recommend the use of the total basin?
2-38	2.8 Circulation & Vehicular Access	Paragraph 1 state, “The Los Angeles County Fire Camp #2 ..but access to their site is through the JPL service road bordering their facility.” Should also note that the Fire Camp can be accessed through park roads.
2-29	Bicycle Routes	If bicycle are allowed in the park, we would prefer that they would be limited to only the perimeter trail/road and the trail/road be made of permeable material so as to discourage riding at unsafe speeds.

2-42	Chart of Parking-Eastside	The both the figures of Johnson Field having 200 spaces and the Ventura Lot having 50 spaces seems inflated.
2-44	Eastside Recreation	What permits were obtained when Johnson Field was constructed? Paragraph 2: It appears that the current plan does not keep to the community expressed wishes to “keep it natural.” Although the plan does an excellent job in incorporating the widely diverse needs, it does not reflect adequately what the majority expressed in terms of keeping it natural. The second bullet in the list notes, “provide lakes or a water feature that will bring back birds and perhaps, put HWP on the bird flyway that runs the length of the state.” Seems to be misleading since the two small lakes are in the midst of an active recreation area. The third bullet in the lists notes, “promote those activities that will attract wildlife and protect and enhance native species” is also misleading and is inconsistent with the planned projects, which encourage greater human and vehicular access to the basin. We would recommend that no fishing be allowed in the lakes and that the lakes be landscaped with plant barriers which can be viewed over. If possible, provide paths around the lake, which are covered with vegetation with openings to watch the wild life. This has been done at a number of wildlife refuges and allows persons cool walking paths without frightening off the wildlife. Please don’t overdue.
2-48	Community Outreach	
2-49	Recreation & Sports	
2-53	2.13 Signage & Graphics	
3-5	Water Conservation	In the seasonal Flood Management/Water Conservation Pool, the plan uses acre-foot in reference to debris rather than cubic yards. Usually acre-feet refer to water volumes. Perhaps you can include both (one parenthetically) so readers can easily comprehend the size of the grading project.
3-10	Permanent Lakes	Paragraph 2 notes, “...incorporate a shallow shelf at the edge of the lakes for wetlands habitat and safety.” This may create an avian botulism problem due to the shallow water heating up. It would also encourage people to enter and play in the lake, both would not be helpful in encouraging wildlife to occupy the lakes. We would prefer landscaping to prevent access to the edge of the lake. <i>(See 2-9 item above)</i>
3-11	Implementation of the Grading Pan	No reference is made as the replacement ration for mitigating the removal of existing trees. We would prefer to see 1:5 ratios with on-site replacements.

3-12	Habitat Restoration	The plan uses the term habitat restoration to mean the elimination of good existing consolidated habitat and replacing it with landscaping features using native flora. It converts wildlife habitat to human habitat.
3-16	8. Sycamore Field & Relocated Disc Golf	States, “ <i>This along with other vegetation will create a larger and better quality habitat of southern willow scrub than currently exists in the relocated disc golf area and along the eastern edge of the Perimeter Trail.</i> ” This is a misleading statement. What is planned is a landscaping project that uses native plants. It fragments existing habitat and intersperses active recreation in the midst. It might make it a nice looking park, but it is not improved habitat.
3-17	11. East and West Lakes	Fishing and bird watching do not mix well. These lakes should be protected from non-native fauna such as Bull Frogs and domestic pet dumping.
3-20	Habitat Restoration Table	Even though the chart’s numbers balance, it is <u>very</u> misleading. The chart shows a loss of 3.2 developed acres after the addition of 3 new sports fields. The classification seems to incorporate the playing fields and the Disc Golf into the Southern Willow Scrub and Southern Sycamore Riparian Woodland categories.
3-23	Southern Willow Scrub	Last paragraph on the page states, “... <i>existing habitat will begin to die as the area is frequently inundated.</i> ” This may be a misleading statement. The current habitat has experienced several storm events and survived. There is nothing inherently bad about habitat dying from inundation. Habitat, which dies, is part of the natural process and it still habitat for wildlife. Question: During the past 30 years, what was the longest period of time that the current willows habitat been inundated?
3-38	Bicycle Route	Surfaces on which bicycles would be allowed should be natural and constructed to discourage high-speed riding (speed bumps, etc.) Perhaps the proposed route on the northwest side of the park could make a “walk your bike” area..
3-46	West Arroyo Parking & Inner Park Access	We disagree with the plan’s proposed shared-use parking structure because it would increase vehicular traffic through the lower oak grove and significantly impact the park atmosphere. Every effort should be made to discourage vehicles from moving about the basin floor. Access and egress from parking areas should be the primary reason for vehicle movement. PAS is strongly opposed to using this or any parking spaces in the park for off-site parking for Central Arroyo events.

3-47	Equestrian Refuse Disposal Area	Why is the City getting into the business of hauling equestrian refuse. Rose Bowl Riders and others cover the costs. On the issue of a central point for trash, we would prefer that it be located near park entrance roads and constructed and landscaped so that it is in keeping with the natural and historic character of the area.
3-50	Gabrielino Trail Area	It is hard to see why 200 parking spaces are needed since the current area is considerably smaller. Perhaps a lot with 50 spaces is adequate enough.
3-53	Westside / Oak Grove Area-Park Entrance	Why lighting, since the park's hours are from sunrise to sunset. The adjacent intersection is lighted sufficiently for persons to see that the gate has been locked.
3-54	West Arroyo Parking	We disagree with the plan's proposed shared-use parking structure because it would increase vehicular traffic through the lower oak grove and significantly impact the park atmosphere. Every effort should be made to discourage vehicles from moving about the basin floor. Access and egress from parking areas should be the primary reason for vehicle movement. PAS is strongly opposed to using this or any parking spaces in the park for off-site parking for Central Arroyo events.
3-56	Circulation and Parking Improvements	Widening the road to Johnson Field and constructing 200 parking spaces seems like overkill. It would significantly impact existing habitat and the newly planted trees along the road. Making it easier for vehicles to access the area will only mean more traffic, which will impact the natural area.
3-61	Sewer Systems	PAS requests that all trenching for sewer systems and utilities be routed under existing roads.
4-3	Phase 1C	Question: Why wasn't the Conservation Pool included in this phase since Sycamore Field/Disc Golf must be raised with material from the area near the dam?
4-4	Phase 1F	It is unclear what is meant by "Construct the West Arroyo Inner Park Access and equestrian refuse disposal area." Question: Does this mean the existing road will be widened?

A-5	Parking Structure Alternatives	<p>PAS would prefer that JPL build its own parking structure on its own land and the City get out of the parking business. With that said, it would see that Alternative 2 would be the best alternative since it would be less disruptive of current traffic flow by keeping eastside JPL traffic on the eastside. The current 1143 space lot seems to have sufficient space to also locate the eastside sports fields and eliminate the 200 space Johnson Field parking area since traffic for sports field events could use a portion of one of the structures. The loss of the enlarged spreading basins doesn't seem significant.</p> <p>The following species is <u>not</u> listed under <i>Recent Observation and Historical Records</i> Arroyo southwestern toad (<i>Bufo microscaphus</i>] <i>californicus</i>) nor is the California Gnatcatcher (<i>Poliptila californica</i>) listed for the Lower Arroyo (last siting 6/2001)</p>
B-11	Appendix B.2 Biological Inventories	
E-24	18.2.2 Southern Willow Scrub	<p>Description fails to adequately describe the virtual destruction of the more natural existing consolidated habitat and the “restoration” with park like landscaping interspersed with active recreation using native flora.</p>