

September 16, 2002

City of Pasadena
Planning and Permitting Department
175 No. Garfield Avenue
Pasadena, CA 91109-7215

Attention: Joshua Hart
Associate Planner

Subject: Comments on the Arroyo Seco Master Plan and Draft MEIR

Dear Mr. Hart:

The WPRA is a nonprofit public benefit corporation dedicated to informing residents about issues affecting the quality of life of West Pasadena. All residents in the area bounded by Fair Oaks Avenue, Colorado Boulevard and the southern and western City limits are eligible for membership. The WPRA has over 600 paid members and publishes a free quarterly newsletter to over 4,400 households in West Pasadena. We, as an organization, have spent considerable time reviewing the Arroyo Seco Master Plan (ASMP) and draft MEIR, talking with our constituents and seeking advice of environmental issue specialists.

WPRA is a member of the coalition known as the Coalition for the Protection of the Arroyo (CPAS) that has submitted a detailed response to the MEIR, and is a signatory to the document. We heartily endorse all the comments in the CPAS document and offer the comments below to emphasize the comments in that document, which are of greatest concern to WPRA. We find several core deficiencies in the ASMP and MEIR that need addressing.

General Comments

The ASMP together with the supporting MEIR gives every impression of being a series of public works projects that address physical infrastructure and active recreation. The emphasis must clearly be on restoration, protection and preservation as well as maintenance of the Arroyo Seco. Somehow these goals, as expressed in the ASMP and MEIR, fall far short of public expectations. This is a serious failure that must be addressed if we, the public and the government of Pasadena are to fulfill a vision to restore and protect an irreplaceable and unique natural area. In the words of President Teddy Roosevelt when he viewed the Lower Arroyo many years ago, "Mr. Mayor, leave this alone".

Over the years, the natural character of the Arroyo has been changed, in large part by human intervention. Much of the historic additions such as stone walls have been an enhancement. Unfortunately, much has been a terrible abuse. It is not too late to devote our resources and energy to restoring what can be restored, preserving all that is worthy of this magnificent place and ensuring that adequate funds and personnel are available to maintain what we have. A phased approach to restoration and minimally impacting improvements must be the highest priority. We only have one chance to do what we and future generations will perceive as our stewardship. It is the sincerest desire of WPRA that we do it right and not rush to adding all manners of physical additions that violate the very essence of the Arroyo. Bicycles on new trails and other unnatural intrusions must not compromise the sound of one's own footsteps, tranquility and the calls of birds.

The bias in the ASMP and draft MEIR towards active recreation and addition of physical infrastructure is seen in the frequent references to the Lower Arroyo as a natural park. It is officially designated as a natural preservation area. The operative word "preservation" seems somehow to have been relegated to a lesser role. This must be corrected.

WPRA also believes that the ASMP was not adequately reviewed by the public before it was published, and prior comments were not considered. The claim has been made that the individual initial draft master plans were created after public comment was considered. This simply is not the case. The conceptual Lower Arroyo master plan was commented on and much of the negative comment by the public on specific issues was ignored. But, the current ASMP is not the same as the combination of the conceptual plans that were approved by the City Council. This ASMP significantly expands on physical projects and introduces numerous specific design details and environmental impacts that the public had no knowledge of until the ASMP and draft MEIR were made public this summer. There has been no public input to the actual ASMP under consideration, only to earlier conceptual plans. Even then, overwhelming public comment has been ignored on several important elements.

Therefore, WPRA strongly supports the position of CPAS that the present MEIR not be certified and that the ASMP be revised to reflect the desires of the community and to emphasize preservation and restoration goals as being primary.

We wish to offer some general comments that reflect major concerns expressed in the CPAS response to the MEIR. Our comments are more specific for the Lower Arroyo Master Plan (LAMP) and draft MEIR as our neighborhood includes the Lower Arroyo. In general, the ASMP and draft

MEIR is significantly deficient in omitting relevant considerations as follows:

Omissions in the ASMP and draft MEIR:

1. No consideration is given to the proposed Watershed Management plan for the Hahamonga Watershed area and the significant potential changes such a plan would make on the projects proposed.
2. No consideration is given to the environmental impacts and mitigation in the Central Arroyo and surrounding neighborhoods for the possible residence of a NFL football team at the Rose Bowl, nor the alternative of an increase of major events to 25. There is no alternative proposed for mitigating increase in traffic and parking requirements. The RBOC must be included as a stakeholder and any proposed plans they may have relating to the Rose Bowl and the Brookside Golf Course included in the Central Arroyo Master Plan (CAMP) and draft MEIR.
3. No consideration is given to the proposed Watershed Management plan for the removal of the concrete flood control channel in the Central and Lower Arroyo although the 1996 LAMP specifically indicated this as a desired goal.
4. Lack of alternatives to the proposed parking structure in the Hahamonga Watershed Park. No declaration of overriding concerns by the City Council should be considered without alternative plans proposed together with an appropriate EIS included in the draft MEIR
5. No consideration is given to the restoration of the natural streambed in the Lower Arroyo with the removal of the concrete flood control channel.
6. No alternatives for restoration of the natural stream bed in lieu of the proposed extension of the BFI low flow stream into the Memorial Grove area of the Lower Arroyo is considered.
7. No sources of funding for maintenance of the various proposed projects are provided.
8. No provisions are made for the additional policing of the proposed bicycle pathway, picnic area, parking lots and segregated trails in the Lower Arroyo.
9. Failure to adequately address safety issues and mitigations related to the proposed bicycle pathway in the Lower Arroyo.

Major Concerns with the ASMP and draft MEIR

1. The proposed parking structure in the Hahamonga Watershed Park. The impacts cannot be mitigated according to the MEIR. Insufficient justification for this structure is provided in the ASMP.
2. Bicycle path in the Lower Arroyo together with the other proposed modifications to the trails system to accommodate the bicycle path. How many times must the vast majority of citizens say “no”?
3. Proposed hardscape projects that violate the natural environment of the Lower Arroyo:
 - 20 space parking lot at the Southern entrance together with buildings and picnic area
 - New 500 foot long, 24 foot wide road to the proposed parking lot at the Southern entrance
 - Unnecessary widening of the existing road at the main entrance requiring extensive civil work and loss of vegetation
 - Unnecessary new bridge across the flood control channel near the Camel’s Hump area. Future removal of the concrete channel would make this a lost investment.
 - Parking area by the Roving Archer’s clubhouse. Existing natural soil area is currently used and no hard surface with stripping is justified.
4. Extension of the BFI low flow stream into the Memorial Grove area requiring considerable civil work due to grade differentials. Restoration of the natural stream with removal of the flood control channel would mean this is a lost investment. Further study after final disposition of any plans to remove the flood control channel is required together with an EIR before this project should proceed.
5. Addition of a picnic area in the major unspoiled natural open space area on the West side of the flood control channel just south of the La Loma Street bridge. The disturbance natural ambiance, wildlife habitat and difficulty in preventing vandalism, consumption of alcohol and littering are overriding reasons to abandon this project.
6. Widening of existing footpaths plus resurfacing will destroy the natural quality of these meandering trails that blend with the natural environment

7. Extensive new signage and interpretive kiosks in the floor of the Lower Arroyo

The above is by no means the extent of the concerns of WPRA but are offered to direct the attention of the City Staff and Recreation and Parks Commission to areas of major controversy. The citizens have spoken on many occasions about dissatisfaction with these elements of the ASMP and we urge the City to listen to and heed their clear voice to redraft the ASMP and MEIR to be responsive to goals of restoration and preservation.

WPRA does thank the City Staff for the hard work in preparing the plans and MEIR. It is obvious that hired consultants had much to do with shaping the thrust of the ASMP and we wish that Staff had corrected many of the problems before the document was released. We believe that in true spirit of cooperation, CPAS, WPRA and all the citizens of Pasadena can create a Master Plan that will serve us and future generations well. Preservation, Protection, Restoration and Maintenance are the goals.

Sincerely,

Richard Davis
Board of Directors
West Pasadena Residents Association