

ARROYO SECO FOUNDATION

August 23, 2012

Rosa Laveaga
City of Pasadena, Department of Public Works
Attn: Engineering Division
100 N. Garfield Avenue
Pasadena, CA, 91101

Dear Rosa,

Thank you for the opportunity to comment on the initial study and the scope of the environmental review process for the Multi-Benefit/Multi-Use Project (MBMU). We have reviewed the initial study, attended both scoping hearings, and have been active participants of this review process since the notice of preparation was given on July 16th. Please find attached our comments on the initial study and the scope for the environmental review of MBMU.

The project description provided in the Initial Study for the Supplemental Environmental Impact Report (SEIR) of the Hahamongna Multi-Benefit/Multi-Use Project (MBMU) lacks sufficient detail and is inadequate to estimate or determine the scale of environmental impacts that might be caused by MBMU. This is a major problem and has hindered the ability of the public to offer the most effective and relevant comments to the scope of the environmental review. We ask that the initial study be re-issued providing a more complete project description, including details of each project component. Please also provide the location and magnitude of any filling and grading activity. We urge that the public be given another opportunity to comment on a more complete project description.

The Multi-Benefit/Multi-Use Project and other elements of the Arroyo Seco Master Plan need to be re-evaluated for consistency with the General Plan Open Space and Conservation Element, the Los Angeles County Flood Control District sediment removal and management program and other new developments in Pasadena before any groundwork begins.

The Arroyo Seco Foundation supports the preservation and protection of the natural character of Hahamongna and hope that MBMU will accomplish that goal.

Sincerely yours,



Tim Brick
Managing Director

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ARROYO SECO FOUNDATION

ASF Comments on the Scope of the Supplemental Environmental Impact Report for the Hahamongna Multi Benefit-Multi Use Project

Project Description

The project description provided in the Initial Study for the Supplemental Environmental Impact Report (SEIR) of the Hahamongna Multi-Benefit/Multi-Use Project (MBMU) lacks sufficient detail and is inadequate to estimate or determine the scale of environmental impacts that might be caused by MBMU. Similarly the description of the project components is inadequate. Among other details, the project description should include information about the estimated quantities and locations of the grading and fill material to be used to elevate the project areas out of the Hahamongna flood plain. Previous drafts of the project description of the habitat restoration project element call for raising more than 20 acres of the Arroyo Seco flood plain in some parts more than 10 feet. These clarifications are needed to evaluate the habitat and wildlife impacts and need to be made before the scope of the SEIR can be fully evaluated.

Before proceeding with the SEIR, a revised project description with greater detail should be provided.

Restoration and Its Goals Should Be Detailed and Defined

The scope of the SEIR should clearly define the restoration portions of this project including habitat restoration and the restoration of Berkshire creek and the approach that is to be taken to restore them. Properly planned and implemented restoration in Hahamongna could be very beneficial to the area, but the objectives and process of the restoration efforts as presented are problematic. The current scope seems to reflect an ambiguity about restoration. What is described as “habitat restoration” in several instances would better be labeled “landscaping.” The SEIR should evaluate the potential ecological benefits of the proposed restoration plan. It would be counter-productive if restoration activity disrupts

the existing thriving ecological processes of Hahamongna. The proper goal is to enhance those processes.

ASF and Stakeholder Involvement in the SEIR Process

The Arroyo Seco Foundation is committed to making the Hahamongna SEIR as effective and educational as possible. We would like to work with the City of Pasadena, other agencies involved in the project and concerned community members and Hahamongna stakeholders to ensure that project impacts are properly evaluated and benefits enhanced. We believe that the SEIR can and should be a wonderful educational process for the City of Pasadena, stakeholders and the community.

Integrate Resources (Water, Habitat, Sediment, Recreation, Open Space, Wildlife, etc.)

The Arroyo Seco Foundation is for a true integration of natural resource management of the entire Arroyo Seco including the immensely valuable habitat and water resources of Hahamongna Watershed Park. As demonstrated by California's Integrated Regional Water Management Program, this is the new standard for planning projects such as those contained in the Hahamongna SEIR. Hahamongna is rich with many natural resources. Each MBMU project component should be evaluated to determine how it impacts each natural resource individually and how it impacts the system of natural resources as a whole.

Alternatives

The definition of project alternatives is clearly a key task of the Hahamongna SEIR, but the narrow definition of project objectives (cf. below) severely restricts the consideration of more preferable alternatives.

The scope of the Hahamongna Multi-Benefit/Multi-Use project should include several alternative sites for the proposed Sycamore Grove athletic field and a solid evaluation of each location being studied comparing it to the site in Hahamongna Watershed Park.

MBMU contains seven components. Some of these components will have greater impact on the environment than others. In addition to a complete "no project" alternative, please evaluate project alternatives that remove the individual components with the greatest negative environmental impacts.

Incorporate Watershed Studies

Since the Hahamongna Watershed Park Master Plan was prepared, there have been a series of important studies of the area that consider a more science-based watershed approach to Hahamongna. The documents, which can be found on the ASF website (www.arroyoseco.org) include:

1. The Arroyo Seco Watershed Restoration Feasibility Study (2002);

2. The Arroyo Seco Watershed Management and Restoration Plan (2006);
3. The Arroyo Seco Watershed Assessment (2011) prepared for ASF by CDM; and
4. The US Army Corps of Engineers Arroyo Seco Watershed Feasibility Study (2011).

Please take into consideration the strategies outlined in these documents for the ecosystem restoration and watershed management of Hahamongna and describe how the Hahamongna MBMU project is consistent or inconsistent with them.

Project Components Referred to as Improvements

The subjective term “improvement” should be removed from the initial study and SEIR when describing project components and project alternatives. Many stakeholders of Hahamongna think that any development would be a detriment to the area.

Incorporating AS MEIR Comments

Along with the Arroyo Seco Master EIR itself, please incorporate by reference all relevant comments made to the MEIR in this SEIR.

Open Space and Conservation Element of the Pasadena General Plan

Please clearly describe the consistency of each project component and project alternative with the Pasadena General Plan Open Space and Conservation Element (OSCE). This element contains extensive language providing for the protection of Pasadena’s open space, especially natural open space such as Hahamongna.

(OSCE Page 1) “Here in Pasadena, that dream was special-with the mountains to the north, and the Arroyo Seco on the west and Eaton Canyon on the east, residents were embraced by the natural world. Those who lived here delighted in their proximity to nature, while still appreciating the comforts of civilization.”

The environmental impacts of MBMU should be evaluated in the context of maintaining the delight of Pasadena residents regarding their proximity to nature.

(OSCE Page 1) “Pasadena has always been a special place, and to preserve that unique identity, we need to protect and acquire open space, protect and restore our air and water resources; we must revive that special Pasadena dream and pass on these opportunities and resources to our children.”

The SEIR should evaluate whether MBMU protects open space, air and water resources.

(OSCE Page 6) “The Conservation Element must contain goals and policies to protect and maintain natural resources such as water, soils, wildlife, and minerals, and prevent wasteful resource exploitation, degradation, and destruction.”

The SEIR should evaluate whether MBMU is consistent with this statement.

The vision statement of the OSCE states “Pasadena treasures, protects, restores, and expands its natural open space and exemplifies innovative and effective natural resource stewardship and conservation.”

The SEIR should evaluate whether MBMU is consistent with this vision.

Ongoing Implantation Measure of the OSCE (OSCE Page 25) “Protect the existing natural open space within the Hahamongna Watershed Park Master Plan area.”

The SEIR should evaluate whether MBMU is consistent with this implantation measure.

Medium-Term Implementation Measure of the OSCE (OSCE Page 30) “Develop a science-based strategic plan to restore habitats in the Hahamongna Watershed Park area.”

The SEIR should evaluate whether MBMU is consistent with this implantation measure.

Berkshire Creek Is Not Formed by a Storm Drain (Page 2-5)

While it is true that water of Berkshire creek enters Hahamongna in a storm pipe, the creek flows, and is formed, from a significant catchment in La Canada Flintridge.

Basin (Page 2-7)

The Hahamongna Basin was not formed by Devil’s Gate Dam. A basin is formed by geological processes including the flow of water. Devil’s Gate Dam may be a geographical boundary that separates the “Devil’s Gate Basin” from the rest of the Arroyo Seco Watershed, but was not instrumental in the formation of the basin. Both titles, “Hahamongna Basin” and “Devil’s Gate Basin,” are appropriate, but Hahamongna Basin is preferred.

Existing HWP Overflow Unpaved Parking Area

The area referred to as “Existing HWP Overflow Unpaved Parking Area” has historically not been used for parking purposes, and should not be labeled as such. Until the 1990s, this area was used for several decades as a soil amendment processing area and was degraded by industrial activity. This area has

potential to naturally recover with fully functional habitat the same as the rest of Hahamongna given the opportunity.

ASF does not believe that any expansion of parking there is needed or appropriate, but if parking is expanded there, the area should remain unpaved like the parking lot in the Lower Arroyo to maintain a more natural character.

Exhibit 2.3 and 2.4 Reference to Hahamongna Basin

Exhibits 2.3 and 2.4 use three arrows to define the Hahamongna Basin. This labeling is inadequate and should be replaced with a delineated outline of the defined basin. The current labeling of the basin misrepresents the size of the Hahamongna Basin, and may lead to confusion as to what area is defined as the Hahamongna Basin.

Disc Golf Displacement

The project description should describe in detail the displacement of any disc golf holes associated with each alternative and provide detail regarding the disc golf course.

Project Objectives

The project objectives are extremely restrictive to the formation of project alternatives for this SEIR.

The first project objective is to “implement the goals of the Hahamongna Watershed Park Master Plan (HWPMP)”. The HWPMP was adopted nine years ago and was written several years earlier. Since then there have been numerous changes and events that have impacted the Hahamongna area and should now shape planning there. These include:

1. The Station Fire in 2009;
2. Southern California’s Intense Drought of 2007-2010;
3. California’s program of Integrated Regional Water Management and a new approach to environmentally sensitive projects;
4. The addition of soccer fields and athletic facilities at Pasadena parks;
5. LA County Flood Control District’s Sediment Removal and Management Program now being studied in a separate but related EIR;
6. Numerous studies of watershed management and environmental issues in the Hahamongna area as detailed above;
7. A dramatic improvement in naturally occurring habitat restoration in the main part of the Hahamongna stream zone and buffer area;
8. Pasadena’s adoption of the Green City Action Plan and the UN Environmental Accords that pledge to protect water and natural resources and rare open spaces like Hahamongna;

9. The Pasadena City Council action in July 2010 to eliminate one proposed athletic field contained in HWPMP;
10. The addition of the thirty acre Hahamongna Annex, which has not formally been incorporated into the HWPMP;
11. The depletion of the Raymond Basin, which has led to new pumping restrictions on local groundwater pumpers;
12. The recent spotting of the endangered Least Bell's Vireo at Hahamongna;
13. Changing attitudes toward bicycles and multi-modal transportation;
14. The lack of a comprehensive trail system through the Arroyo for people, horses and bikes;
15. US Forest Service has vacated its former ranger station in Hahamongna and reduced its presence and security function there; and
16. Pasadena's adoption earlier this year of a new Conservation and Open Space Element of the General Plan, which states a goal of protection open space in Hahamongna and should now serve as the guiding framework for Hahamongna planning.

The goals and objectives in HWPMP do not reflect the current goals and objectives of the citizens of Pasadena. HWPMP should now be reviewed and updated to reflect these changed conditions.

In the light of these changes and events, it is not appropriate to state that the first objective of MBMU is to implement the goals and objectives of HWPMP. Such an objective severely limits the consideration of environmental impacts and alternatives to MBMU.

Project Objective #2 states "Respect, and to the extent applicable to the project, implement the goals and objectives of the City of Pasadena's Green Space, Recreation and Parks Element, Open Space & Conservation Element, and Green City Action Plan." The Conservation and Open Space Element calls for the conservation of natural open space, including Hahamongna. This is completely inconsistent with several of the components of the Multi Benefit-Multi Use Project and with many of the components of the HWP Master Plan.

Project Objective #3 states "Implement components of the HWP Master Plan, leveraging state, local, and other funding sources as available." This objective is far too narrow and restricting. It eliminates the possibility of identifying alternatives that meet the goals and objectives of MBMU or the master plan itself, as well as the current concerns of Pasadena residents. Please reconsider this project objective.

Project Objective #4 and #5 states "Satisfying the commitments that the City of Pasadena has made in grant applications for components of the project" and "Comply with the requirements of awarded grants and committed funding entities," respectively. These objectives seem to prejudge the significance of related environmental impacts and the outcome of the SEIR itself. They may also lead to serious environmental issues as several of the grant applications were submitted more than a decade ago. The public perception of environmental resources has changed significantly in the last ten years, and these stated objectives may hinder the possibility of finding the best alternatives that satisfy best watershed management practices and the growing awareness about the importance of water and

natural resources in our region. These objectives may also lead to inconsistencies with obligations Pasadena has in protecting Hahamongna, natural open space and wildlife corridors.

It appears that approximately six acres of the proposed Westside Perimeter Trail and other project components overlap with the provisions of the Settlement Agreement between the City of Pasadena and the Spirit of the Sage Council regarding the Arroyo Seco Master Plan Project Master EIR. This may conflict with project objective #6.

Project objective #6 states “Restore, enhance, and reestablish the historical native plant communities of the Arroyo Seco, including improving habitat quality and diversity where possible, and removing non-native and invasive plants where possible.” This project objective is inconsistent with project components that call for the filling in and grading of many acres of native plant communities that have been recovering for over a decade.

2.4.1 Sycamore Grove Multi-Purpose Field

Hahamongna Watershed Park is not the best location for another multi-purpose athletic field for numerous reasons. The SEIR should include several other feasible alternative sites for this athletic facility. Given the amount of public backlash to this project component, the SEIR should be extremely thorough in analyzing the environmental impacts of this alternative.

2.4.7 Habitat Restoration

The habitat in the project area has been recovering successfully since 1994 when gravel operations and other industrial uses ceased in Hahamongna. Large areas of healthy habitat are now thriving there, including Sycamore woodlands, oak woodlands, Southern willow scrub and mulefat. This SEIR should include an in depth analysis of the need and potential for major habitat restoration taking into consideration the natural recovery of habitat in the last 18 years. The SEIR should include an alternative habitat restoration effort that involves no filling or destruction of existing habitat, focuses on restoring existing habitat zones, and includes extremely minimal development and heavy machinery and focuses on invasive species removal.

3.1 Aesthetics

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Hahamongna Watershed Park is in a stream corridor at the foot of the San Gabriel Mountains. As such, Hahamongna is subject to periodic flooding. Each year the weather patterns are different and create unique rainfall, runoff, sedimentation and biological patterns. A major part of existing visual character of Hahamongna is the ever changing and unpredictable landscape. The SEIR should evaluate the impacts to this unique character of Hahamongna Watershed Park not as a temporary or extended time period, but as a permanent alteration.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The initial study states that a project objective is to comply with the requirements of awarded grants and committed funding entities. One grant that has been awarded to Pasadena calls for lighting for the proposed multi-purpose field. Please evaluate nighttime lighting and its impact on wildlife in addition to its effect on day or nighttime views.

3.4 Biological Resources

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The initial study states that this project “has the potential to temporarily disturb the habitat onsite during construction.” There is nothing temporary about the construction activities necessary to complete this project. Filling in and grading the areas for this project will permanently destroy coast live oak woodland, southern willow scrub, sage scrub, streambed riparian and southern sycamore riparian woodland habitat.

Members of the Pasadena Audubon Society have recently documented the presence of the Least Bell’s Vireo, an endangered species, in the footprint of MBMU.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The initial study states that the project is intended to improve habitat, but the IS notes that construction has potential to disturb the existing habitat that is intended to be restored. This is troubling. Please conduct an analysis on the ecological benefits of the proposed “restoration” compared to current conditions.

c. Have a substantial adverse effect of federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Wetland habitat in California has been reduced by over 90% in the last 100 years. The ecology of wetlands is immensely valuable for a number of natural resources such as water resources and sediment. Given the importance of wetlands and the objective of restoring habitat, it makes no sense to destroy some of the last remaining wetlands in California. Even if mitigation measures take place, the benefits of this natural wetland habitat cannot be replaced.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The “significant habitat restoration” referred to in this section is problematic. The destruction of existing high value natural habitat will have a substantial impact on the movement of native resident or migratory fish and wildlife species and with established native resident or migratory wildlife corridors. Hahamongna serves as a major wildlife corridor from the San Gabriel Mountains to the San Rafael Hills and across the foothills of the San Gabriel Mountains. This SEIR needs to fully evaluate this interference. The dismissal of this impact raises concerns about the thoroughness of the initial study for this SEIR.

f. Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan?
The Pasadena General Plan Open Space and Conservation Element should serve the role of an adopted Habitat and Conservation Plan. Please evaluate this in the SEIR.

3.5 Cultural Resources

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The sediment load from the Station Fire may have in it embedded paleontological resources that may be disturbed or lost during construction of the MBMU.

3.7 Geology and Soils

b. Result in substantial soil erosion or the loss of topsoil?

The proposed multi-purpose field will be constructed on the edge of a migratory river channel subject to intense flooding. As the project requires the field be elevated out of the inundation level, these flooding events may have the potential to erode the fill used for raising the pad needed for the field. The same is true for the proposed “habitat restoration,” in which some versions of the project description call for raising the elevation out of the flood level. This raised pad would extend 200 meters into the floodplain and river bed of the Arroyo Seco cutting the width nearly in half. This has the potential to cause significant erosion of this raised pad.

3.10 Hydrology and Water Quality

a. Violate any water quality standards or waste discharge requirements?

In addition to the thorough description of potential water quality hazards during construction and maintenance of MBMU provided in the IS, please evaluate the impacts of rodenticides, pesticides and herbicides that will likely be used in ongoing maintenance of the proposed athletic field.

Some discussion has been taking place about the possibility of using artificial turf for Sycamore Grove Field. Please evaluate all potential impacts of artificial turf on water quality including surface water runoff.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

This project proposes “limited” impervious surfaces, the net impact of numerous individual projects with “limited” impervious areas is a major contributor to groundwater depletion in the Raymond Basin. Please evaluate this project as a component of the large scale problem that is significantly reducing the total pervious area of the Raymond Basin.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on-or off-site?

As noted this project will significantly alter drainage patterns in Hahamongna. This project is taking place in Hahamongna **Watershed Park**, a name that clearly reflects the mindset of the Hahamongna stakeholders in keeping the area natural, the impact on cultural resources should be also included. Local residents and stakeholders have repeatedly stated their desire to maintain a natural drainage pattern through Hahamongna, including the main channel of the Arroyo Seco. Limiting the ability of the Arroyo Seco stream to spread out onto the existing floodplain will not only impact the habitat dependent on this natural process but also the character of the park.

Sediment management in Hahamongna Basin is a very hot topic. Developing a project with the potential for significant siltation and erosion problems in the very area efforts are being made to develop a sustainable sediment management program raises many serious concerns. Please take the evaluation of this impact very seriously. MBMU has a project objective of reducing erosion from Berkshire Creek. This objective should be extended to reduce erosion throughout Hahamongna.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?

Project descriptions of MBMU components have included language that describes raising developments out of the flood level of the Arroyo Seco. The acknowledged potential for MBMU to cause flooding on- or off-site shows a contradiction with the goals of this project. In addition to cumulative MBMU flooding impacts, the SEIR should evaluate thoroughly all potential flooding issues for each project alternative. A map delineating existing flooding potential should be compared to flooding potential given each project alternative.

Flooding should not exclusively be deemed a negative environmental impact. Many habitat zones depend on intermittent flooding conditions to maintain a healthy ecosystem. Please evaluate the environmental impacts of flood prone areas as they affect the specific habitat of each area.

h. Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?

The IS does not define the 100-year flood zone, but the MBMU footprint is clearly within it. MBMU proposes raising an area on the western half of the Arroyo Seco channel and floodplain out of the flood

prone area. This raised area, which includes the Sycamore Grove Field, should be considered a structure and a potential flood hazard. This issue does require further evaluation by the MBMU SEIR.

3.11 Land Use and Planning

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

MBMU is in direct conflict with the Pasadena General Plan Open Space and Conservation Element. Much of the language of OPCE calls for preserving existing natural open space and acquiring more property for the purpose of increasing natural open space. MBMU proposes developing an athletic field and parking lot expansion on existing natural open space. Furthermore, MBMU proposes a habitat restoration plan that will bury existing natural open space consisting of some of the highest quality habitat in Los Angeles County. Please correct the suggestion that MBMU has “No Impact” on this issue by acknowledging that MBMU has potential for a significant effect and requires subsequent and supplemental CEQA documentation.

- August 23, 2012