

August 22, 2012

Dear Ms. Laveaga,

Please accept the following comments regarding the Initial Study of the Multi-Benefit Multi-Use project for Hahamongna Watershed Park. As a long-time Pasadena resident, former soccer mom, avid trail runner, and a PhD level geologist, I have strong and significant concerns with the Sycamore Grove Athletic Field component of the project

The entire Hahamongna region provides natural flood control for the inevitable floodwaters that will come down the Arroyo Seco Watershed. We are all familiar with the high water levels that occasionally accompany significant rainfall in the area. The sediment accumulation and large boulders in the flood plain are evidence that even higher runoff levels are common (geologically speaking). Flooding, high runoff, and sediment load have increased since the Station Fire. The entire Hahamongna basin provides the first natural line of defense in protecting all of the downstream areas against the potential of devastating floods. Furthermore, unique and important habitat exists only in regions subject to periodic inundation by floodwaters.

Artificially filling any portion of this important flood control resource is a foolish and shortsighted use of resources and our natural habitat. These issues are inadequately addressed in the EIR. In particular:

- Will the elevated soccer field region be physically separated from the rest of the Hahamongna basin? If so, by what means? If not, how will the elevated region be protected from erosive activity of inevitable floodwaters?
- What materials will be used to build the elevated region? Where will they come from? How will they be transported to the site? How will downstream areas be protected from the increased sediment load that will inevitably occur as this elevated area erodes?
- Building the elevated area will necessarily cause a constriction of future floodwaters through Hahamongna. Has this impact on surface hydrology been quantified? It will have significant impacts on surface water flow through Hahamongna and downstream that must be evaluated and defined before building the elevated athletic fields.
- Artificially changing the size of the Hahamongna Basin will have a significant, and likely negative, impact on the potential for groundwater recharge. As the demand for water resources in Southern California continues to grow, we should be maximizing our use of groundwater recharge areas. The proposed project would remove much of the Hahamongna Basin from the groundwater system. Has that been quantified and reconciled with future water needs in the area?

A closely related concern of mine is the integration between this proposed project and LA County's Sediment Removal program. Will the projects be integrated in any way? From my understanding the County will be actively removing sediment from the area while the City of Pasadena will be importing material for elevating the athletic field area. Please tell me that this ultimate irony will not actually take place.

It is unclear from the project description how the athletic fields will be implemented.

- Will they be comprised of living turf/grass? That is my assumption since it is the norm for local fields. Please define the surface material.

- What are the watering needs for this grassy area? Where will the water come from? Is that a reasonable use of our limited water resources in the area?
- Most turf and grass fields make extensive use of artificial pesticides to promote healthy growth year round? Will these fields require chemical pesticides? Of what type? How much and how often? What are the environmental consequences of this pesticide use downstream of the fields? To the groundwater system?

The EIR states that there will be no adverse impact on wildlife or natural habitat by completion of the project. I find this difficult, if not impossible, to believe. Elevating a significant portion of the Hahamongna Basin with artificial fill will necessarily impact the habitat that the fields are built on. While new habitat might be created, it cannot replicate the wetland area that thrives on periodic inundation by water. Particular habitat concerns are the following:

- It is unclear exactly how habitat will be restored as declared in the EIR. What type of habitat will be created/restored? A definition of plantings and where they will be placed is necessary.
- Has the additional human use in the area been evaluated for its inevitable impact on habitat and wildlife in the basin? This will include increased vehicle traffic and additional foot traffic.
- The resurgence of the black willow/cottonwood system in Hahamongna is very exciting to those of us who get excited about return of natural habitats. This habitat requires wetlands and periodic inundation by floodwaters; it will not thrive on an elevated soccer field! Will the proposed project impact these species?

As an avid athlete and parent of two athletic teenagers, I understand and appreciate the need for additional athletic fields in Pasadena. However, I do not believe that Hahamongna is the right place for additional fields. In addition to my tremendous concerns about this project destroying natural habitat and important flood control resources, I do not believe this is the right place for our City to invest scarce resources. The proposed site sits adjacent to La Canada and would not be convenient for most residents. The vast number of school fields in that area of La Canada make it hard for me to believe that a field in this area would help the soccer situation. There must be areas in other parts of the city where we could invest our limited resources and benefit many more residents than this proposed project.

Thank you for your time and attention,

Kristen Farley

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