

**CHATTEN-BROWN & CARSTENS**

2601 OCEAN PARK BOULEVARD

SUITE 205

SANTA MONICA, CALIFORNIA 90405

www.cbcearthlaw.com

TELEPHONE:(310) 314-8040  
FACSIMILE: (310) 314-8050

E-MAIL:  
ACM@CBCEARTHLAW.COM

August 3, 2009

*Via Email*

Theresa Fuentes  
Assistant City Attorney  
City of Pasadena  
215 N. Marengo Ave.  
Pasadena, CA 91101-1503

Re: Additional Comments and Concerns Regarding the Hahamongna Annex  
Master Plan

Dear Ms. Fuentes,

Thank you for meeting with Friends of Hahamongna (Friends) on Friday July 24, 2009 to discuss the bike path and hiking and equestrian trail proposed for the Hahamongna Annex property. As we stated at the meeting, Friends is concerned with the potential current and future impacts of the proposed 30 foot bike path and trail corridor. We discussed reducing those impacts by narrowing the proposed corridor. We also discussed the alternative bike path route previously proposed by Friends that would move the proposed bike path to an existing unimproved road on the south and east side of the Annex property. The City is concerned that installing a paved bike path at this location could violate a settlement agreement it has with the Spirit of the Sage Council. Friends does not agree that locating the bike path on the existing unimproved road would violate the terms of the agreement the City has with the Spirit of the Sage Council, but has suggested that the City consider locating the section of the alternative bike path in question on the adjacent Annex property, while leaving the remainder of the bike path and the whole of the trail on the existing unimproved road.

It is Friends' understanding that the City will put markers in place to demonstrate the potential dimensions of both bike path and trail locations for the Planning Commission site visit to the Annex property. At the meeting, we also discussed holding another meeting prior to the Planning Commission site visit, at which time staff will be able to present detailed information about the proposed bike path and trail locations, as well as show us the locations on an aerial map. As a further alternative, Friends proposes that the City consider separating the bike and pedestrian path from the equestrian trail and locating the bike and pedestrian path on the existing trail and the trail at another location on the property.

As a final note on the bike path and trails, we have discovered that the Initial Study for the Hahamongna Watershed Park Master Plan Addendum incorrectly states that the existing trail corridor on the north side of the Annex property is 10 to 12 feet in width. The Initial Study should be corrected to reflect that the actual width instead varies from 7 feet to over 25 feet in some areas.

At the conclusion of the July 24 meeting, you requested that Friends prepare a list of any additional concerns we have regarding the City's plans for the Annex property. Per your request, the following list is a list of our concerns with suggestions for rectifying the problems where applicable. While we have attempted to list the concerns in order of priority, we believe that all of these issues are important and should be addressed by the City.

#### **A. Land Designation and Intended Uses**

- One of the Friends' primary goals is to ensure that the uses of the Annex continue to be low intensity in the future, as supported by the community and as stated in the proposed Master Plan for the Annex. There are several components in the plan, however, the purpose of which seems to be either to facilitate building a road and/or to reconfigure the property for more intensive uses in the future. These objectionable components include: the proposed 30 foot corridor; the infrastructure relocation for the equestrian center; and the access realignments. We believe these components should be removed from the Plan.
- At the July 24 meeting, Friends pointed out that we do not believe it is necessary for a portion of the Annex property to be zoned PD as part of the Planned Development area for the JPL Parking Lot. The portion of the PD area located on the Annex is set out to be used for only open space purposes, so Friends requests that the City subdivide the portion of the PD Zone area in the Annex from the remainder and rezone the subdivided Annex area as Open Space as allowed by Zoning Code Section 17.26.020(C)(2) and the approved PD Plan. This subdivision of the PD should be included as an action item in the Open Space Element of the City's General Plan, currently in preparation, with a timetable for how and when this is to be accomplished.
- The Annex documents should be amended to refer to the fact that the property was purchased under the California Surplus Lands Act to be used solely for open space and recreation purposes.

## **B. Inclusion of All Available Overflow Parking**

The Annex Plan should be amended to show that there are at least 220 additional parking spaces in Hahamongna Watershed Park which could be used for occasional Annex special event overflow parking. This includes the 200 spaces JPL East Arroyo parking lot and a 20 space parking lot that is currently planned for the Equestrian Picnic Area in the southwest corner of the park.

## **C. Other Master Plan Projects of Concern**

Friends have further concerns about the proposed projects within the Annex area in addition to the proposed 30 foot corridor. At the top of the priority list are those projects that Friends believes should be removed from the Master Plan Addendum and Initial Study. The remaining projects of concern are those projects not yet discussed in adequate detail in the Initial Study so as to allow the public and decision makers to assess whether all impacts have been disclosed and mitigated.

### **1. Reconfiguration / relocation of the main, jumping, and oval arenas to meet industry standards and/or accommodate other Master Plan projects.**

The arenas and attached infrastructure are owned by Rose Bowl Riders, Inc. Most of the infrastructure was built through donations from the membership. Changes to that infrastructure would need to be reviewed and approved by the general membership. Reconfiguring arenas involves the following time consuming and costly steps, which may result in potentially significant impacts:

- Excavation of underground electrical and water lines attached to the arena rails. For the main arena, light poles will have to be removed as well.
- Removal of existing rails.
- Scraping off existing sand-based topsoil. The topsoil that has been scraped up will contain some clay so cannot be reused for a reconstructed arena.
- The existing hardpan must be broken up so that it can be removed.
- Removal of numerous tons of broken up hardpan material
- Grading of new arena location/configuration
- Enough clay or a mixture of sand and decomposing natural material (wood chips) will need to be hauled to the Annex to form a layer for the arenas that is several inches thick. Large amounts of material will be required for the relocated arenas and this material can be costly.
- The clay (or other materials) will be wetted and compressed with heavy equipment, usually a vibrating roller.
- The clay will be graded to a 2% slope off the centerline.

- Crushed limestone will form the next layer for the hardpan. It will also need to be compacted using a vibrating roller.
- Washed sand, which is very expensive, will form the top layer.
- The rails will need to be re-anchored
- The water and electrical underground infrastructure will need to be replaced.
- The light poles for the main arena and sprinklers for the main and jumping arenas will need to be replaced.

The reestablishment of the hardpan could result in air quality and traffic impacts due to the large amounts of materials that will need to be hauled off or onto the site. Noise impacts from the construction equipment required for this process, in particular the vibratory roller, could also have significant impacts. Additionally, if not done properly, the reconstruction of the arenas could result in significant hydrological problems for the site.

The stated objectives of the Annex plan can and should be met without the expensive reconfiguration of the public equestrian area.

## **2. Reorganization of horse boarding area and realignment of north-south access roads.**

There is insufficient project description to assess the impacts from the reorganization of the horse boarding area and realignment of north-south access roads to this area, which would likely be significant. Realigning the road could result in significant impacts because it could require extensive grading, filling, and excavation that has yet to be disclosed and would require the movement of a large amount of infrastructure. The infrastructure that would need to be relocated includes barns and stalls that, except for the trainer barn, are owned by individual members of Rose Bowl Riders, Inc., not by the Club, or the City. The question of modifying privately owned assets needs to be addressed.

In addition, there is significant underground infrastructure to supply water and electricity to the barns and free standing stalls. Moving stalls involves the removal of existing footing (sand and base), grading and reestablishment of the footing. The Master Plan Addendum and Initial Study need to make clear what will be moved and to where. With the exception of some minor grading on the existing access roads, there is no identified need for this project and the cost would be significant. It should also be noted that the horses would need to be temporarily relocated during construction, which would generate a significant cost to the City.

The stated objectives of the Annex plan can and should be met without the expensive reorganization of the horse boarding area and the realignment of the access roads.

The Master Plan Exhibit Maps should also include the existing circulation around the main arena. The plan as shown would require all vehicles with trailers to enter the gated horse boarding area to make a circuit around the Equestrian Center. The existing circulation around the upper area works well even with large events. There is no need to change it.

**3. Extensive rehabilitation or replacement of the Clubhouse and relocation of the Mach 1 barn.**

The Clubhouse, built in the early 1950s, is owned by Rose Bowl Riders, Inc. The barn currently housing Mach 1, which was built before 1969, is also owned by Rose Bowl Riders, Inc. Changes to either structure would need to be reviewed and approved by the general membership. This should be noted in the Master Plan documentation.

**4. Improvements for drainage and erosion purposes.**

The Master Plan Addendum and Initial Study propose to use equestrian best management practices. This proposal should be reviewed by a hydrological expert, with experience in equestrian uses, with the aim of reducing costs for the City by coming up with a plan that protects water quality while eliminating the unnecessary reconfiguration of infrastructure and access routes. The equestrian best management practices plan should be conceptually prepared prior to approval of the Master Plan Addendum to allow the public and decision makers to assess its adequacy.

**5. Use of lights in the Equestrian Center main arena.**

The use of lights in the main equestrian arena is an existing use dating back 20 – 25 years. Rather than eliminate the use of lights for lessons in the winter, which would lessen recreational opportunities for Pasadena residents, the existing lights should be replaced with state of the art lights that concentrate the illumination within the ring itself. The use of lights after dark at both the Equestrian Center and the former Forest Service campus are existing uses which have never before required the extension of park hours. As this is an existing use, the continued nighttime operation of the lights at the main arena would be part of the baseline conditions for the site and thus not a new environmental impact. However, if park hours were extended, it would necessitate the placement of security lights in several Hahamongna parking lots where lights are not currently located, which would be a major new environmental impact that was not contemplated in the

Arroyo Seco Master Environmental Impact Report. (MEIR p. 13-108, [in response to a comment regarding nighttime lighting, the MEIR states, “none of the fields or parking lots in Hahamongna Watershed Park are proposed to have lights.”].)

**6. Secure property for animal safety.**

The original project to install gated/controlled vehicle access to boarding area was removed in the latest revision to the plan. Gated access is needed to secure the boarding area and how and where this access will be placed needs to be described. There will be infrastructure additions to provide the electric gates needed at both the north and south access roads and the placement has to be carefully planned to provide safe access for cars, trailers and horses.

**7. Eliminate any impediments at the primary entrance to the public equestrian area.**

It is unclear what the City means by eliminating any impediments at the primary entrance to the public equestrian area. If impediments include trees, grading, paving, fencing or other infrastructure removal, there are additional environmental impacts that need to be discussed and/or mitigated. The Master Plan Addendum and Initial Study should explain what this project involves.

**8. Centralized waste facility.**

There is no detail in the Master Plan Addendum or Initial Study about the proposed centralized waste facility. This facility was originally proposed for inclusion in the Hahamongna Master Plan to be located outside the Annex, but was removed from the Plan before it was approved. In the current plan, the facility is to be located in the extremely small horse boarding area. Without more detail on the design of the centralized waste facility, including its size, it is unclear whether the facility will fit within the horse boarding area.

**9. Parking for horse boarding area.**

The proposed location for parking for the horse boarding area appears to be on a Southern California Edison easement, but the easement is not discussed in the Master Plan Addendum or the Initial Study. Has Edison’s approval been obtained? If the approval cannot be obtained, where will the parking be located?

**10. Rehabilitation of the old USFS structures.**

The City is proposing to refurbish the abandoned United States Forest Service structures located on the Annex property. Due to the age of these buildings, Friends believes the buildings likely contain asbestos. The Initial Study should disclose whether asbestos is present in these buildings, and if so, mitigation measures for the removal of any asbestos should be included.

**D. Unsatisfied Public Records Act Requests**

The Upper Arroyo Seco Stream Sustainability Project is a currently proposed project which could have significant environmental impacts upon the Annex and the Hahamongna Master Plan area. The Friends have tried repeatedly to obtain documents related to this project, including the grant application and environmental review document, through California Public Records Act requests and continue to request these documents as they are relevant to our study of the Annex plan.

Thank you for the opportunity to comment upon the Hahamongna Annex Plan. Feel free to contact me if you have any questions

Sincerely,



Amy Minter

cc: Pasadena Planning Commission  
Rosa Laveaga, Arroyo Seco Project Supervisor