

Friends of Hahamongna

Comments and Concerns Re

Hahamongna Watershed Park Master Plan Addendum and Draft Initial Study

January 8, 2010

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I. Introduction

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The Friends of Hahamongna (FOH) is an advocacy group of Pasadena, La Canada and Altadena residents working together for the protection of Hahamongna Watershed Park, one of Pasadena's last great open spaces. Our members are united in our support of this environmental treasure. We have attended hundreds of meetings over the past decade monitoring Pasadena's master planning process for the park and have been actively engaged in the planning process for the Annex. We are working cooperatively with the Spirit of the Sage Council, the Hahamongna Watch Group and other park advocacy groups as the City of Pasadena moves forward to implement the Hahamongna Watershed Park Master Plan (Hahamongna Master Plan).

FOH views the Hahamongna Watershed Park and the entire Arroyo Seco as Pasadena's greatest natural treasure and are concerned that the projects outlined in the Hahamongna Watershed Park Master Plan Addendum (Annex Plan) emphasize development, paving, and leveling natural habitat areas. In addition, we are concerned that the current projects may facilitate future projects related to constructing roadways and developing parkland for revenue generating purposes.

The purpose of this document is to express our comments and concerns about the Annex Plan and Initial Study, focusing primarily on the inadequacy of the California Environmental Quality Act (CEQA) documentation.

II. List of Concerns

A. CEQA

- FOH b2 [1. The Initial Study prepared for the Annex Plan fails to provide adequate analysis of the significant adverse impacts several of the projects included in the Plan would have. FOH has been told that the impacts of these projects will be studied at a later date, when individual projects are approved. The impacts of these projects should be analyzed now.
- FOH b3 [2. Additionally, despite claims that impacts of projects would be studied on an individual basis when they are approved, the Annex Plan proposes the use of a Master Conditional Use Permit that would serve as the only future approval required for many of the future projects and would negate claims that future environmental review will be completed.
- FOH b4 [3. An EIR should have been prepared for the Annex Plan since the projects located on the Annex property are not within the scope of the review that was prepared for Hahamongna **prior** to the acquisition of the Annex property. Additionally, the projects included in the Annex Plan would have significant adverse environmental impacts and/or require new or additional mitigation measures that must be analyzed in an EIR.
- FOH b5 [4. There are numerous errors, inaccuracies and inconsistencies within the Annex Plan and the Initial Study that need to be corrected. These are listed in detail in labeled sections below.
- FOH b6 [5. The Focused Analysis of the Bikeway and Trails presented in Section 4 of the Initial Study provides an inaccurate and inadequate analysis of the environmental impacts associated with the proposed bikeway and alternatives to that proposal.

B. Extensive Number of New Projects

- FOH b7 [1. Annex Plan includes approximately 90 new projects, many of which have potentially significant impacts resulting from tree removal, extensive grading, paving, structure relocation, underground infrastructure removal or relocation, equestrian facility reconfiguration, and possible demolition and reconstruction of the equestrian clubhouse. (Appendix A-1)

C. Public Desire for Low Intensity

- FOH b8 [1. A primary goal of Friends of Hahamongna (FOH) 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 Hahamongna Annex Plan.
- FOH b9 [2. Several of the new components in the Annex Plan appear to be in conflict with the Plan's stated goal of maintaining only low intensity use of the Annex. The objectionable components include: tree removal, the proposed exclusive use bikeway, the infrastructure relocation for the equestrian center; and the access realignments. The purpose of these components seems to be to either to facilitate building a road and/or to reconfigure the property for more intensive uses in the future.

D. Land Use Issues

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- 1. As FOH has expressed in meetings with City representatives, 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 Jet Propulsion Laboratory (JPL) West Parking Lot. We have found no basis for staff’s assertion that rezoning the Annex to Open Spaces will put the JPL parking lease in jeopardy.

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- 2. There are many projects in this Annex Plan that as proposed would be costly and not likely eligible for grant funding, such as the reconfiguration of the boarding area. This represents fiscal irresponsibility on the part of the City during extremely challenging economic times that are resulting in staff reductions as well as cut backs on services to the public.

E. Road/Bikeway/Trail

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- 1. The use of the JPL bridge as a temporary bicycle route crossing is a new project, not found in the Hahamongna Master Plan, that was added to the Initial Study. The bike route adopted in the Hahamongna Master Plan parallels the Perimeter Trail and then crosses to the east side of the park on a proposed North Bridge Crossing. The JPL bridge was not proposed as part of the adopted bike route.

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- 2. Another significant change made to the bikeway project AFTER the Annex Plan was reviewed and commented upon by all the advisory bodies is that the corridor is no longer shared-use for pedestrians. The **bike-only** restriction to the bikeway projects will likely significantly reduce grant opportunities for this project, as grants often support “shared-use”.

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- 3. The bikeway project has been touted by staff as being necessary to complete the bicycle recreation loop around Hahamongna Watershed Park. However, the continuation of the bikeway north of the Annex area is in question due to the Spirit of the Sage Council Settlement. The bikeway project should not move forward until an acceptable continuation route is determined that does not jeopardize the Arroyo Seco Master Environmental Impact Report (Arroyo Seco MEIR) or violate the Spirit of the Sage Council Settlement.

F. Trees

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- 1. The Annex Plan’s proposal to remove all 70 non-native trees on the Annex is a new project in the plan, added AFTER the Annex Plan was reviewed and commented on by the Planning Commission, the Design Commission and the Transportation Advisory Commission. The Urban Forestry Advisory Commission was never given the opportunity to comment upon the Plan.

G. Impact on Current Uses

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- 1. The Annex Plan includes components that directly affect assets and structures owned by either Rose Bowl Riders or individual members that board at the facility. The Annex Plan must recognize and address this relative to the impact on the club and individuals and the cost that may be incurred by the City.

FOH b17 [2. The Annex Plan recommends the expansion of the boarding area to accommodate up to 70 horses (from the current 38). However, it does not address the additional impacts that would result from this increase including additional parking needs and necessary barn reconfiguration.

FOH b18 [3. The Annex Plan and Initial Study propose to use equestrian best management practices. This proposal should be drafted by a hydrological expert, with experience in equestrian uses, not a City staff member with limited expertise.

FOH b19 [4. The Annex Plan and Initial Study state that the equestrian boarding and youth camp areas are being realigned to address drainage issues when planning documents show they are being realigned to provide circulation around the property from the formerly proposed road on the Annex (Figure 1).

FOH b20 [5. The Annex Plan's recommendation to limit the use of lights at the boarding facility would significantly restrict activity at the equestrian facility, especially in the winter months. Lighting after dusk is necessary for all aspects of horse care including feeding, grooming, exercising and emergency care.

H. Parking

FOH b21 [1. The Annex Plan fails to include all available parking for the Annex within Hahamongna, including 200 spaces of the JPL east lot and at least 20 parking spaces that are planned for the Equestrian Picnic area in the southwest corner of the Park.

I. Public Records Act Request

FOH b22 [1. FOH has submitted a California Public Records Act request regarding the Upper Arroyo Seco Stream Sustainability Project which has yet to be answered satisfactorily. FOH has reason to believe that documentation related to this project may have an impact on the Annex planning and the previously certified Arroyo Seco MEIR for the Arroyo Seco Master Plans, of which the Hahamongna Master Plan is a component.

III. Friends of Hahamongna Recommendations

- FOH b23** [1. Reject the Initial Study as legally inadequate for this level of development and recommend the preparation of an Environmental Impact Report for the Hahamongna Annex.
- FOH b24** [2. Remove the bikeway project from the Annex Plan until a suitable location is identified for the bikeway continuation north and east from the Annex area that does not violate the Spirit of the Sage Council agreement or jeopardize the adequacy of the certified MEIR and until funding is secured.
- FOH b25** [3. If the bikeway is approved, follow the recommendations of the Commissions and the Hahamongna Advisory Committee and retain all 70 non-native trees on the Annex except the four which must be removed for the bikeway.
- FOH b26** [4. If the bikeway is approved, reject the exclusive use for bicyclists only and make it for shared use, following the same standards as used for all the other bikeway segments in Hahamongna. These have a paved bikeway and an immediately adjacent soft surface path with no buffers or barriers and an average width of about 16-ft.
- FOH b27** [5. Remove reconfiguration of the boarding area and realignment of the access routes until the purpose can be documented, adequately evaluated for impacts, and funded.
- FOH b28** [6. Re-zone the portion of the Annex currently zoned PD-16 to Open Space.
- FOH b29** [7. Remove the recommendation for a Master CUP.
- FOH b30** [8. Include the Annex and all of Hahamongna under the Arroyo Seco Public Lands Ordinance.
- FOH b31** [9. Correct or remove the numerous errors, inaccuracies and inconsistencies in the Annex Plan and Initial Study as identified in the sections below.
- FOH b32** [10. After the removal from the Annex Plan and Initial Study of the objectionable projects with potentially significant impacts, allow the remainder of the projects with significant community support to move forward, including the Environmental Education Center and the Equestrian Therapeutic Recreation Area.

IV. Details on Concerns

A. CEQA Violations

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The approximately 90 new projects added to the Arroyo Seco Master Plans by the Hahamongna Watershed Park Master Plan Annex Plan include numerous projects that have potentially significant impacts. (A detailed list of projects is included in the appendices.) These impacts should be studied in an EIR to ensure the impacts have been disclosed and mitigated as required by CEQA. The Annex Plan cannot rely upon the analysis contained in the MEIR prepared for the Arroyo Seco Master Plans because neither the Annex property, nor the projects proposed for the Annex, was within the scope of that Master EIR. In addition, the Station Fire may have created substantial changes to the environment under which the MEIR was certified

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The projects that have potentially significant impacts and may require additional mitigation measures include tree removal, extensive grading, paving related to the bikeway, structure relocation, underground infrastructure removal or relocation and equestrian facility reconfiguration. FOH presented alternatives for the Annex bikeway project that would substantially reduce impacts, but the project proponents have declined to adopt the alternatives.

1. An EIR Should be Prepared for the Annex Plan.

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CEQA requires that the adverse environmental impacts of all projects (including plans) be analyzed in an environmental review document prior to the approval of the project so that mitigation measures can be included in the project and alternatives to the project can be considered. Limited environmental review has been prepared for the Annex Plan due to reliance upon the Master EIR that was prepared for Hahamongna Watershed Park Master Plan in 2002, prior to the acquisition of the Annex property. Public Resources Code section 21157.1 states that a Master EIR “may allow for the limited review of subsequent projects that were described in the master EIR as being within the scope of the report.” *If, and only if*, the subsequent projects were identified in the Master EIR, then CEQA allows for limited review of the subsequent projects in an initial study if the subsequent projects “will have no additional significant effect on the environment... that was not identified in the master environmental impact report and that no new or additional mitigation measures or alternatives may be required.” (Public Resources Code section 21157.1(c).) If such findings cannot be made, a mitigated negative declaration or EIR shall be prepared. (Public Resources Code section 21157.1(d).) The intended use of a MEIR is for the individual projects contained within an area for which a plan has been prepared; it is not intended for use for a new plan for an area not within the boundaries of the plan analyzed in the MEIR.

The City has chosen to prepare an Initial Study for the Annex Plan, claiming that additional environmental review is not required for the Annex Plan because the projects included within Plan are within the scope of the Master EIR that was prepared in 2002 for the Arroyo Seco Master Plans and because the Annex Plan projects would not have any additional potentially significant environmental impacts or require any additional mitigation measures. FOH strongly disagrees with all three of these conclusions.

a. The Annex Plan is Not Within the Scope of the MEIR for the Arroyo Seco Master Plans

First, the Annex Plan includes approximately 90 new projects that were not identified in the Arroyo Seco Master Plans or analyzed in the MEIR for the Arroyo Seco Master Plans. (The Hahamongna Watershed Park Master Plan is one of the four components of the overarching Arroyo Seco Master Plans.) FOH has compiled a detailed list of the new projects contained in the attached Appendix A-1. The Initial Study acknowledges that the projects at the Annex were not within the scope of the Master EIR, stating: the existing [Hahamongna Watershed Park Master Plan] did not identify any improvements or physical changes for the Annex site; consequently, the MEIR did not evaluate the environmental impacts of any physical changes in the Hahamongna Annex.” (Initial Study p. 1-1.)

The Initial Study incorrectly claims that “The Arroyo Seco Master EIR included the Hahamongna Annex as part of the project site, and baseline investigations conducted for the MEIR evaluated the Annex site.” (Initial Study p. 1-1.) Clear language within the MEIR refutes this claim:

The proposed project area includes three subareas known as Hahamongna Watershed Park (approximately 300 acres, part of the Upper Arroyo Seco), the Central Arroyo Seco (approximately 550 acres), and the Lower Arroyo Seco (approximately 150 acres). The Upper Arroyo Seco includes the approximately 300-acre Hahamongna Watershed Park Master Plan area plus an additional 1,000 acres north of the Jet Propulsion Laboratory (JPL) bridge....The analysis of the Upper Arroyo Seco is limited to the 300-acre Hahamongna Watershed Park; the mailing address is 4550 Oak Grove Drive.

(Final MEIR p. 12-1 to 12-2.) The 30 acre Annex property was not part of the Hahamongna Watershed Park at the time the MEIR was prepared and is not within the 300 acres referenced in the document. Thus, contrary to the claims of the Initial Study, the Annex property was not studied in the MEIR. Because neither the Annex property, nor the projects proposed for the Annex were included in the MEIR, the Annex Plan is not a subsequent project within the scope of the MEIR.

Additionally, as discussed in detail below, the approximately 90 new projects would have potentially significant impacts that have not been analyzed. The projects that have potentially significant impacts and may require additional mitigation measures include tree removal, extensive grading, paving related to the bikeway, structure relocation, underground infrastructure removal or relocation and equestrian facility reconfiguration.

b. The Initial Study Relies on Inapplicable CEQA Guidelines to Analyze Annex Plan Impacts

The Initial Study incorrectly “utilizes the familiar framework identified in CEQA Guidelines § 15162 to determine if proposed [Annex Plan] activities may cause any additional significant effects which were not analyzed in the Arroyo Seco Master EIR.” (Initial Study p. 1-3.) CEQA has set out specific procedures for use of a previously certified Master EIR that are different than the procedures for tiering off of other types of EIRs. CEQA Guidelines section 15162 sets forth procedures for tiering off other types of EIRs, not Master EIRs. CEQA sets forth the procedures for use of a Master Environmental Impact Report (MEIR) in Public Resources Code sections 21157 through 21157.6, and CEQA Guidelines sections 15175 through 15179.5. For purposes of using a previously prepared MEIR,

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“‘additional significant environmental effect’ means any **project-specific** effect which was not addressed as a significant effect in the Master EIR.” (CEQA Guidelines § 15177(b)(3), emphasis added.) Because the majority of the projects included in the Annex Plan were not identified in the MEIR, the project-specific impacts could not have been addressed in the MEIR.

c. The Annex Plan Would Have Additional Impacts and Require Additional and New Mitigation Measures

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The Initial Study appears to conclude that if an impact occurs in one place it is the same impact if it occurs in another location. However, if an impact would occur at the Annex property under the proposed Plan and that impact would also occur in areas of the Hahamongna Watershed Park that were analyzed in the MEIR, the impact at the Annex property would be *in addition* to the impacts that would already occur at the Hahamongna Watershed Park. For instance, the Initial Study states that short-term air quality impacts from construction would be the same as that analyzed in the MEIR. This is not true; the air quality impacts from construction at the Annex property would be *in addition* to the air quality impacts from construction at the existing Hahamongna Watershed Park. This is of particular concern because the Initial Studies shows that construction air quality impacts from Annex projects only are close to exceeding the South Coast Air Quality Management District’s local thresholds of significance for PM-10 and PM-2.5 and because the site is located near the sensitive receptors at La Canada High School. The Initial Study also incorrectly fails to acknowledge that the Annex Plan would have short-term visual, traffic and parking impacts that are in addition to the impacts analyzed in the MEIR. The Annex Plan would likewise increase the area where impacts to special status species could occur and where archeological resources could be disturbed.

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The Annex Plan also requires additional and new mitigation measures. Although not specifically listed as a mitigation measure, the Annex Plan requires the replacement of all non-native trees that the Annex Plan has slated for removal, and also requires the removal be phased to allow replacement to occur at the same time as removal. This is a new mitigation measure not included in the MEIR. New mitigation is also required for the Annex Plan due to the Initial Study’s finding that there is inadequate parking for special events at the Annex. The Initial Study requires that this impact be addressed in permits for special events, which is a new mitigation measure.

d. Station Fire Substantially Changed Environment Surrounding Hahamongna Watershed Park

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Further, there has been a significant change in circumstances since the MEIR was certified in 2002. The 2009 Station Fire has created substantial changes to the environment by destroying 160,000 acres of habitat. The Initial Study relies on analysis that was prepared in the MEIR, which has become obsolete due to the biological changes that have resulted from the Station Fire. This fire destroyed habitat for numerous wildlife species, including many species of special concern. According to a U.S. Wildlife and Fish Technical Specialist report, 63% of the Arroyo Seco Watershed was burned. (http://www.fs.fed.us/r5/angeles/station/BAER/SpecialistReports/WildlifeAssessmentReport_PublicRelease_StationBAER.pdf , p.12.)

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For all of these reasons, the preparation of an EIR should be required for the Annex Plan. Preparation of an EIR would allow for a thorough analysis of all of the potential adverse impacts of projects included in the Annex Plan and consideration of alternatives and mitigation measures that would reduce the significance of those impacts. An EIR would also form an adequate basis for future

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approvals required for projects at the Annex property.

2. Initial Study Incorrectly Claims that the Annex Plan Would Not Intensify Uses

The Initial Study states that “existing uses of the subject property would either remain the same or would lessen in intensity...”. (Initial Study p.1-2.) **This is incorrect**. The following is a list of ways in which the Annex Plan would intensify uses of the Annex property:

- The Annex Plan p.3-22 states that “[T]he operators of the leased horse boarding area will be encouraged to make that facility more efficient, allowing for boarding corrals for up to 70 horses”. This would be an increase of 34 corrals from the current 36 and **a much more significant impact**. There will be a need for additional tack room space, additional parking, and additional hay and feed storage, all of which will take more space in the boarding area which is only 2.3 acres. There would potentially be almost twice as much traffic since there will be twice as many boarders. The amount of manure generated would almost double. There could be significant impacts upon recreation because Tom Sawyer’s program has approximately 70 horses on the property in the summer. Arena usage has to be carefully scheduled even at the current number of horses to accommodate all programs in the summer.
- The therapeutic riding program will have an entirely new facility, up to four additional horses and an undetermined number of additional students, **creating potentially significant impacts**. The increase in horses and students will generate similar impacts to those listed above. MACH 1 may also want to continue to use the large main arena for programs so they might also be impacted if the number of horses in the public boarding area were almost doubled.
- New uses are proposed on the former Forest Service campus in addition to the increase in public assembly uses which the Initial Study acknowledges, **creating potentially significant impacts**. Since the Forest Service campus is currently sitting essentially unused except for the Pasadena City College environmental program, all other proposed uses are new uses which have not existed on the property recently. For example, the group picnic area will be a new use as will the environmental vocation center.
- The City’s own Carrying Capacity Analysis demonstrated that the intensity of use of the property would increase. The Forest Service Campus currently is not being used which has been the case since the City purchased the property in 2005. To take one example, the Carrying Capacity Analysis projects at a medium level of intensity of use that the Main Building of the EEC will hold 188 people and require 84 parking spaces. Even if the equestrian uses of the property remain the same, it is inevitable that use of the property will increase with the renovation of the Forest Service campus and that there will be impacts from this increase in use.

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Additionally, there have been unauthorized expansions and modifications of projects approved under the Hahamongna Master Plan and Arroyo Seco MEIR, the **cumulative environmental impacts of which have not been studied**. These expanded and modified uses were not studied in the MEIR and

cumulative impacts associated with these uses call into question the adequacy of the MEIR as a basis for any subsequent projects. Examples of projects that have been expanded or modified from what is included in the Hahamongna Master Plan and analyzed in the MEIR include:

- ? The Sunset Overlook Project was to have the parking removed to be replaced with habitat restoration. Instead now 25 parking spaces are to remain and an additional 10 spaces are proposed, according to a staff presentation to the HWP Advisory Committee on September 29, 2009. **These impacts have not been evaluated.**
- ? The Eastside Neighborhood & JPL (Altadena) Connector Trail now has a spreading basin proposed that was not in the original Master Plan, Initial Study, Eastside Neighborhood & JPL (Altadena) Connector Trail, June 2009, p.27. **These impacts have not been evaluated, nor has the relationship of this project to the Upper Arroyo Seco Stream Sustainability project been evaluated.**
- ? Although the Equestrian Staging Area improvements were removed from the Hahamongna Master Plan, there is now a plan proposed for 20 parking spaces in this location which could be used for Annex supplemental parking. These spaces were not shown on Annex Plan Exhibit 3-5 Parking Areas in the Table which lists "Other Future Parking within HWP." **The impacts have not been evaluated.**
- ? The Initial Study is proposing a change in the bike route up to the JPL bridge. (Initial Study p. 2-25.) The northernmost segment of this route on the west side of the park would be a new project not approved in the Hahamongna Master Plan nor studied in the MEIR. **The impacts have not been evaluated**
- ? The Upper Arroyo Seco Stream Sustainability Project has a pending grant application approved by the City Council but its effects upon the Hahamongna Master Plan area have not been studied during the Annex planning process. Despite several requests by the Friends of Hahamongna, we have been unable to obtain the grant application and environmental documentation for this project. **Impacts need to be included in the MEIR.**
- ? The Disc Golf Course was to have been reconfigured as part of the settlement agreement with the Spirit of the Sage Council. Although this is not included in the Annex documents, there may now be plans under consideration which do not conform to the Spirit of the Sage agreement. This is significant in terms of the Annex Plan because the current Disc Golf proposal may conflict with the trail which is proposed along the southern edge of the Annex. All the changes which staff is considering to the agreed upon Disc Golf Course alignment need to be made public at this time **so that the impacts on trails proposed for the Annex can be evaluated.**
- ? According to the Hahamongna Master Plan, pavement was to be eliminated from the park whenever possible (p. 3-59); instead the approaches the Flint Wash Bridge were covered with asphalt. The Design Commission has proposed the use of granular stone for the bikeway on the Annex but this recommendation is not included in the documents. Since the bikeway and the trails are included in a focused analysis in the Initial Study, the surface material which will be used for the bikeway should be

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specified. The analysis of possible surface materials should include the relative environmental advantages and liabilities of the various surface materials, such as asphalt's contribution to the urban heat island effect.

3. Inadequate Analysis of Impacts

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The Annex Plan and Initial Study include specific layout for site (Exhibit 2.5 in Initial Study) and detailed list of projects for Annex (Initial Study pages 2-17 to 2-20) but, the Initial Study fails to provide adequate review of environmental impacts from these projects. CEQA requires analysis of environmental impacts at the earliest possible date. If specific projects are included, they must be studied now. The reason for this is that approval of Annex Master Plan with specific layout and detailed list of projects would commit City to that specific layout and the listed projects. The City could not approve future projects for the Annex that do not conform to layout or are inconsistent with listed projects without first adopting an amendment. The impacts of these projects must be analyzed before the City is committed to these specific courses of action.

The following adverse environmental impacts associated with the Annex Plan have not been sufficiently been analyzed or mitigated in the Initial Study.

a. The Removal of 70 Trees Would Cause Unnecessary Aesthetic Impacts

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i. Tree Removal Would Degrade the Visual Quality of the Annex

The removal of 70 non-native trees will have a major impact upon aesthetics on the Annex. The removal of these trees would substantially degrade the visual quality of the Annex since many of these are mature shade trees which have been growing for decades and provide shade and beauty (Figure F2). They include liquid ambers, Chinese elms, eucalyptus, pine, California peppers, Italian stone pines, and other species. The many visitors to the Annex greatly enjoy the beauty of these trees, the shade they provide, and the wildlife they support.

ii. Landscaped Areas in the Arroyo Seco Do Not Require Removal of Non-Native Vegetation

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The Arroyo Seco Design Guidelines provides different recommendations for use of non-native species depending on whether the area is a landscaped area or whether it is a habitat restoration area. Non-native vegetation is not required to be removed in landscaped areas, and some new non-native vegetation is even allowed to be planted in these areas. (Arroyo Seco Design Guidelines p. 2-5 to 2-7.) The Arroyo Seco Design Guidelines clearly differentiates between landscaped and habitat restoration areas and suggests that new plantings "should be native species when practical". (Arroyo Seco Design Guidelines, 2-1) Landscaped areas include "areas around buildings, natural open space areas, grass areas not used as sports fields, roadways, specialty gardens, and planned beautification areas." (Arroyo Seco Design Guidelines, 2-5)

iii. Non-Native Trees Proposed for Removal at the Annex are Located in a Landscaped Area

The Annex has been a landscaped area since the 1950s and many of these trees are the same species found in other landscaped areas of the Arroyo. Figure F9 shows two photos of California peppers and pine trees growing near the Rose Bowl and the golf course in the Central Arroyo. There has been no effort undertaken to remove non-natives from other landscaped areas of the Arroyo.

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The Hahamongna Master Plan identifies the habitat restoration areas in the park as follows. “The Perimeter Trail will serve as a delineator, separating the stream and its associated restored habitats at the center of HWP from areas of concentrated recreational activity on the westside and water resources facilities on the east side.” (Hahamongna Master Plan, p.3-42). The Annex, with the exception of the oak and sycamore woodland restoration areas, is an area of concentrated recreational activity and NOT a habitat restoration area. The Initial Study and Annex Plan are inadequate in that they do not explain why the Annex is the only landscaped area within the Arroyo where non-native trees are slated for removal.

iv. The Initial Study Fails to Disclose Location of All Trees Slated for Removal

In addition, Initial Study Table 4.2, Trees Impacted by the Bikeway and Trail Along the Northern Property Boundary, includes the removal of only those trees in the formerly proposed road corridor and not the non-native trees that would be removed from the rest of the Annex property. There are many mature shade trees on County Fire Camp 2, on the Forest Service campus, and in the common areas that should be included in the table to fully assess the impacts of this non-native tree removal.

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v. Annex Plan Does Not Provide for Replacement Trees in Formerly Proposed 50 Foot Wide Road Corridor

The aesthetic impact will be most significant in the formerly proposed road corridor when the 33 non-native trees are removed since the Annex Plan does not designate this area for replacement trees. (Annex Plan Exhibit 3-3.) There are no oaks, sycamores, or other native trees indicated in the plan to be planted to replace those which will be cut down. If there is the intent to plant native trees within the formerly proposed 50 ft wide road corridor, the Annex Plan and the Initial Study should make this clear. A detailed plan should be included detailing how many native trees and exactly where within the corridor these will be planted.

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b. The Initial Study Fails to Analyze All Impacts to Biological Resources

i. The Annex Plan Fails to Identify All Areas of Natural Habitat

Annex Plan Exhibit 2-4 ‘Natural Environment: Plant Communities within the Annex’ leaves out an area of natural habitat located on the slope between the jumping arena and the oval teaching arena. This irregularly shaped area is about 30 ft long and 100 ft wide and contains a large, dense brushy growth of sumacs where California quail nest. The last time these birds were seen in the vicinity was about one month ago. Initial Study Exhibit 3.1 ‘Plant Communities within the Annex’ also omits this

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large area of native vegetation. Despite these omissions, the Annex Plan states that the existing biological environment was described and mapped (Annex Plan, p.2-10).

ii. Some Native Trees are Incorrectly Classified as Non-Native in the Annex Plan

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The Annex Plan calls for the removal of 70 non-native trees on the Annex although most of the trees to be removed would fall within the definition of “native” as found in the Arroyo Seco Public Lands Ordinance, Pasadena Municipal Code Section 3.32.020A: “ ‘Native plants’ means those plants historically known to be indigenous to the Arroyo Seco of Pasadena and nearby arroyos of similar ecology and also those indigenous plants of Southern California or countries of similar climates that could naturally exist and flourish in the Arroyo Seco in its present ecology.” Most of the trees along the existing trail have been growing for decades with no supplemental water. These trees are similar to those species found throughout the landscaped areas of the Arroyo (Figure 3). Because these trees could exist naturally (without watering) and are able to flourish in the present ecology on the Annex Property, they should be considered ‘native.’

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The Initial Study states that one of the justifications for removing the non-native landscaping from the Annex is to reduce “the spreading of non-natives into the surrounding areas by reducing the seed bank.” (Initial Study p. 2-23.) What the Initial Study fails to mention, however, is that eight of the trees to be removed are Peruvian peppers, also often referred to as California peppers, which are actually protected trees in the neighboring city of La Canada Flintridge bordering the Annex to the west and north. Within the 8.5 square miles of La Canada Flintridge, pepper trees are protected by city ordinance, La Canada Flintridge Municipal Code 4.26.030, and grown extensively. There is no evidence in the Angeles National Forest to the north that pepper trees have spread invasively beyond the landscaped areas of La Canada Flintridge.

Peruvian pepper trees are the only non-native trees designated for removal in the Initial Study that are referred to in any way as being invasive to the area of the Station Fire, and that reference states that they have a limited ability to be invasive. (Station Fire Invasive Weed Specialist’s Report, p. 3, http://74.125.155.132/search?q=cache:5p251EsQXzMJ:www.fs.fed.us/r5/angeles/station/BAER/SpecialistReports/WeedAssessmentReport_PublicRelease_StationBAER.pdf, incorporated by reference.) The expert report prepared regarding the potential for invasive plants to impact the area of the Station Fire does not list a specific concern for invasion by pepper trees as it does for several other plant species.

iii. Installation of Replacement Trees Would Require Watering

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The non-native trees on the Annex property do not require supplemental watering for their continued existence. The proposal to replace these removed trees with new native trees would, however, require a significant amount of watering to establish the new trees. The Initial Study fails to analyze the increased water usage that would be required for the planting of new trees. The Initial Study fails to acknowledge that the City has severe water usage restrictions in place because of the drought in Southern California.

iv. The Initial Study Fails to Analyze Impacts to Wildlife from Tree Removal

There is a clear biological impact resulting from removing 33 trees in the corridor and a total of 70 on the Annex which has not been evaluated. Many wildlife species use these trees, including migratory birds. The Initial Study fails to accurately analyze the Annex Plan's potential conflicts with the Migratory Bird Treaty through the loss of habitat for these birds. A pair of Coopers hawks, listed as a species of special concern by the California Department of Fish and Game has been nesting in an ash tree that is slated for removal as part of the Annex Plan. The California quail which live on the property will frequently be found in the dense brushy branches of the California pepper trees. During the Christmas Bird Count on December 16, 2009, members of the Audubon society observed four acorn woodpeckers in a palm tree on the Annex as well as three Nutall's woodpeckers in a non-native maple tree. Other birds observed in Hahamongna on the same day were a red shouldered hawk, a Downey woodpecker, an Oak titmouse, Berwick's wren, Junco, goldfinches, and a Hermit thrush. A western grey squirrel, commonly found at higher elevations, was observed January 5, 2010 in the Italian stone pines on the Forest Service campus. FOH will be submitting additional information regarding the importance of non-native trees for area wildlife from a biological expert. Due to the comment period running during several major holidays, FOH will be unable to submit this information until after the comment period, but will do so prior to the City Council hearing on this matter.

v. Biological Surveys for the Annex Property are Outdated

The last biological surveys for the Annex property were conducted in 2002. There have been significant changes in the area of the property since that time that could result in significant changes to the survey results. The Station Fire burned more than 161,189 acres of vegetation, including trees, less than a mile from the Annex property. The Initial Study states that the majority of the habitat burned by the Station Fire was chaparral, although this fails to recognize that the fire also burned large amounts of trees. As noted in a United States Department of Agriculture-Forest Service report on the Station Fire:

Upper slopes contain canyon live oak, interior mixed hardwood, and coast live oak vegetation, transitioning into bigcone Douglas-fir, ponderosa/Jeffrey pine, and mixed conifer vegetation. Single-leaf pinyon occurs on the northside of the burned area, and planted ornamental conifers are scattered throughout. Stream corridors contain riparian mixed hardwood, white alder, willow, cottonwood, and California sycamore vegetation types.

(http://www.fs.fed.us/r5/angeles/station/BAER/2500-8%20BAER%20Assessment%20Report_Station%20BAER_Public%20Release_10.16.2009.pdf, incorporated by reference.)

This report on the Station Fire also notes impacts to numerous species of special concern, including: "Santa Ana speckled dace, arroyo chub, western pond turtle, two-striped garter snake, San Diego horned lizard, coastal rosy boa, San Bernardino mountain kingsnake, San Bernardino ringneck snake, California legless lizard, Nelson's bighorn sheep, peregrine falcon, California spotted owl, western red bat and pallid bat, Coast Range newt, a California state species of concern, and ringtail." (United States Department of Agriculture-Forest Service, Wildlife and Fish Technical Specialist's Report, Burned Area Emergency Rehabilitation for the Station Fire, September 2009)

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http://74.125.155.132/search?q=cache:2pZNBuGK7EJ:www.fs.fed.us/r5/angeles/station/BAER/SpecialistReports/WildlifeAssessmentReport_PublicRelease_StationBAER.pdf, incorporated by reference.) Impacts to those species relying upon trees for habitat is even more significant because of the long period of time need for reforestation. (http://www.fs.fed.us/r5/angeles/station/BAER/2500-8%20BAER%20Assessment%20Report_Station%20BAER_Public%20Release_10.16.2009.pdf, at pp. 6-7.)

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The two-striped garter snake is one of the Forest Service Sensitive species in the Arroyo Seco that has been identified on the Annex in the existing northern corridor trail by Lori Paul, a Registered Veterinary Technician, specializing in wildlife rehabilitation and management who is also a former zookeeper at the Los Angeles Zoo. A recent US Wildlife and Fish Technical Specialist Report states that "an emergency does exist for Sensitive species including the two-striped garter snake in Eaton Wash Watershed as a result of post-fire effects of the Station Fire". (http://www.fs.fed.us/r5/angeles/station/BAER/SpecialistReports/WildlifeAssessmentReport_PublicRelease_StationBAER.pdf , p.51.) **Since populations of the two-striped garter snake are in an emergency situation in other areas of the Arroyo because of the Station Fire, this fact should be taken in to account in assessing the proposed projects on the Annex which will impact existing habitat where this species has been seen.**

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Other species of special concern, in addition to the two-striped garter snake, that Ms. Paul has observed on the Annex were two mammals, the San Diego pocket mouse and the Western gray squirrel. The birds were Acorn woodpecker, Allen's hummingbird, Anna's hummingbird, Band-tailed pigeon, Bewick's wren, Bushtits, California quail, California thrasher, California towhee, Canyon wren, Cooper's hawk, Costa's hummingbird, Gold-crowned sparrow, House finch, House wren, Mourning dove, Oregon junco, Phainopepla, Scrub jay, Spotted towhee (formerly Rufous-sided towhee), Western grosbeak, Western screech owl, Western tanager, White-crowned sparrow, Wrentit, and Yellow warbler. The amphibians and reptiles she observed were the California tree frog, Coast range/California newt, Coastal western whiptail lizard, Pacific gopher snake, Pacific slender salamander, Southern alligator lizard, Southern Pacific rattlesnake, Western fence lizard, Western skink, and the Western toad.

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Due to the significant change in the conditions in the area surrounding the Annex, an updated biological survey of the Annex property is required to adequately analyze the impacts to wildlife that would result from projects at the Annex, in particular the removal of numerous trees.

c. Air Quality Impacts

i. The Initial Study Fails to Analyze the Cumulative Impacts of Particulate Matter Emissions

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The Initial Study fails to adequately analyze the cumulative short-term air quality impacts from construction at the Annex Property. The Initial Study shows that PM-10 levels from construction would approximately 10.41 pounds/day and the local threshold of significance is 12 pounds/day. Even on its own, construction at the Annex would approach the local threshold of significance for this damaging pollutant, which is of particular concern due to the proximity of the La Canada Flintridge High School to the Annex property. Additionally, the Initial Study fails to analyze the cumulative impact of operation PM-10 levels at other areas of the park, listed in the Initial Study as being 1 pound/day, which would result in a level just shy of the local threshold of significance. The Initial Study also fails to analyze the cumulative impact of simultaneous construction at the remainder of the Hahamongna Watershed Park

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with construction at the Annex, which would exceed the threshold of significance. Even though a statement of overriding considerations was adopted for the construction air quality impacts as part of the MEIR for the Arroyo Seco Master Plan, the construction air quality impacts at the Annex would be *in addition* to the impacts already found to be significant, requiring study in an EIR and potentially adoption of a new statement of overriding considerations.

ii. Climate Change Impacts from Loss of Trees Should be Analyzed

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The Annex Plan proposes to remove 70 mature trees from the Annex property. Trees are useful in combating climate change from greenhouse gas emissions due to their ability to absorb, or sequester, carbon dioxide. (EPA fact sheet on carbon sequestration, <http://www.epa.gov/sequestration/faq.html>, incorporated by reference.) The Initial Study analyzes the Annex Plan's potential for generating greenhouse gas emission, but fails to analyze whether the loss of trees would have a detrimental effect due to the loss of carbon sequestration by mature trees.

d. Recreation Impacts

i. "Bikes Only" Restriction on Annex Bikeway Unnecessarily Restricts Use of the Path and May Inhibit Ability to Fund the Bikeway

The final revision of the Annex Plan specifies that the northern bikeway will be restricted to "Bikes Only." Throughout the advisory review process, the administrative record will show that the discussion focused on a bike/hiking shared use path in this location. The proposed alternatives separated the user groups into bike/hiking on the north of the Annex and equestrian/hiking on the south of the Annex so as to lessen the width of the corridor (Figure 8). All the advisory bodies supported this proposal.

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The "bikes only" proposal, which was not reviewed by the advisory bodies, would severely limit recreational opportunities. "Bikes only" in the northern corridor would eliminate not only other non-motorized users on wheels such as in-line skaters but also prohibit universal access by wheelchair. According to the Hahamongna Master Plan "the majority of the bicycle route will be ADA accessible (Hahamongna Master Plan, p.3-69). The 800 foot long "Bikes only" restriction of the bikeway would deny universal accessibility from the Annex out into the park itself. There is a need for both pedestrian and bicycle access in the northern corridor because JPL employees both walk and ride their bikes to work and to recreate in the park. They access the Annex via the JPL Connector Trail.

The Annex Plan also calls for the construction of a universally accessible connection to the Annex from a new transit stop on Oak Grove Drive (Annex Plan, p.3-17). The usefulness of this connection will be greatly reduced if the bikeway to which it leads prohibits wheelchairs and other mobility-assisting devices. The connection would still allow access to the Annex but, if the bikeway were shared use, there would be universal access to the greater park as well. The Initial Study includes a focused environmental analysis of the bikeway and trails but fails to address this major recreational deficiency.

The JPL Connector Trail is currently used by both hikers and bicyclists and has been for decades. There would be a negative impact on recreation if the trail is closed to bicycles because it is not wide enough to allow for both a hard surface bikeway and an adjacent hiking trail. The trail has two massive oaks growing in it which narrow the trail to about four feet near each of these trees (Figure

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4). Other oaks grow along the length of this trail and their drip lines cover the entire trail corridor, making it unsuitable for a hard surface bikeway. The trail cannot be moved because to the west is County Fire Camp 2 which is protected by a 50-year lease and to the east is the NASA JPL property. The Annex Plan and the Initial Study state that this trail will be "improved" and "enhanced." The documents give no details as to what is meant by that, however, even though there is in the Initial Study a detailed focused environmental evaluation of the bikeway and the trails. The documents are deficient in not answering these questions:

- If bicycle use is to be prohibited on the JPL Connector, how will the elimination of this recreational and commuter use be addressed? What mitigations are proposed?
- If, on the other hand, bicycle use will continue to be permitted on the JPL Connector Trail as it has been for many years, why will shared hiking/biking use be allowed on it when it will be prohibited on the bikeway to which this trail connects?

ii. Habitat Restoration Projects Would Remove Recreational Uses

The Annex Plan and the Initial Study do not address why habitat restoration is indicated in certain areas which now support recreation. Annex Plan Exhibit 3-2 shows the area where the jumping arena is now located as slated for habitat restoration.

The apparent removal of the jumping arena for habitat restoration will have a negative impact on recreation which should have been addressed in the Initial Study. Since the Annex is clearly identified as a developed area (Annex Plan, p. 2-14), there is no reason why recreational uses need to be impacted negatively when there are many other areas where habitat restoration can take place without causing these impacts.

iii. Loop Trail Location Should be Modified to Allow Continued Use of Jumping Arena

The jumping arena is also impacted by the location of the new Horse boarding/youth camp loop trail. Annex Plan Exhibit 3-3 shows this trail going through the area where the jumping arena now stands instead of extending to the north of the jumping arena to the edge of the horse boarding area, where a loop trail could be expected to go. The documents fail to show why the habitat restoration area and the loop trail could not be modified so that the jumping arena could remain in its current location. The documents should be revised to decrease the size of the habitat restoration area and to show a trail alignment which would follow the boundaries of the horse boarding and youth camp areas. There is no project in the current plan that requires moving the jumping arena and replacing it with vegetation which is not protected by city ordinance and could be easily be removed. If there are future projects, such as the formerly proposed road, which would require the relocation of the jumping arena, these need to be disclosed and their environmental impacts studied at this time.

iv. Recreation Impacts to Equestrian Uses Must be Disclosed

In addition, relocating the jumping arena is not listed as a potential improvement in the plan although it is a major component of the existing equestrian recreational facilities. The plan should

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include relocation of the jumping arena as a potential improvement or modify the plan exhibits to make it clear that the jumping arena is to remain in its current location. If the jumping arena is to be eliminated, this needs to be disclosed and its impacts upon recreation studied at this time.

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There have also been discussions at meetings on the Annex Plan concerning decreasing the size of the main arena although this is not included in the Annex documents. If there are plans to change the size of the main arena, these plans need to be included in the Annex Plan and the environmental impacts upon recreation must be studied at this time. The Rose Bowl Riders arena is large enough for driving clinics and lessons and has been used for these in the past. It is also ideal for Western disciplines such as barrel racing and is used regularly for this activity. If the main arena is to be replaced with a smaller arena or two smaller arenas not suitable for these activities, this needs to be addressed in the plan and the public given an opportunity to comment. The realignment of the rings in general is not addressed in the Plan; instead all the existing arenas, with the exception of the main arena, are simply not included in any of the exhibits.

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The Annex Plan is proposing to severely restrict equestrian recreational opportunities in other ways: "all recreation and routine horse care and maintenance will be conducted during HWP park hours; in the fall and winter months this may require an extension of the park hours to offset the reduced daylight hours." (Annex Plan, p.3-12) Since most Rose Bowl Riders members work, this will make it impossible for them to ride and care for their horses in the winter. The lights in the horse boarding area and the main arena are decades-old existing uses. The plan documents do not give any rationale as to why this change should be implemented which will effectively make it impossible for many equestrians who work to continue to board their horses on the property. The change would also restrict recreational opportunities by eliminating riding lessons given in the late afternoon and evening hours. This is a major reduction in recreational opportunities which goes against the goals of the Hahamongna Master Plan, one of which is to "provide diverse recreation opportunities for the Pasadena community" (Annex Plan, p.1-8).

v. Impacts of Extension of Park Hours Must be Studied

The Annex documents give an incorrect impression that park hours can be easily extended. The Hahamongna Master Plan states, however, that the park closes at sundown (p.3-68.) The Pasadena Municipal Code states that the natural areas of the Arroyo Seco, the Lower Arroyo and Hahamongna, close at sunset, (PMC 3.24.110(A)23). The documents are deficient in not acknowledging this fact and recommending instead the extension of park hours. The latter would open the park up to possible sports field lighting and security lighting in the parking lots, both of which would in fact have major new environmental impacts, unlike the lighting on the Annex which is an existing condition.

vi. Removal of Numerous Mature Shade Trees Along Proposed Bikeway and Trails Would Negatively Impact Recreation

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The final version of the Annex Plan recommends the removal of all 33 non-native trees not only in the bikeway alignment but also in the entire 50 foot wide corridor. This will have a major negative impact upon recreation and aesthetics since what is now a lovely area of the Annex (Figure F2) will lose all its shade. What is shown along the bikeway in Annex Exhibit 3-3 is "habitat restoration" which could mean chaparral with no shade value. Since the existing trees contribute greatly to the trail experience, it is reasonable to expect that the non-native trees cut down in the corridor will be replaced by native trees in the same locations within the corridor so that they will eventually provide shade and beauty. A mitigation which plants trees elsewhere will not adequately compensate for the damage

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caused in this location. The Plan does state that native plants, both trees and shrubs will be restored along the edges of the bikeway alignment (p. 3-13). The Exhibits, however, show only "habitat restoration." They do not show that there will necessarily be tree replacement within the former road corridor as they do in the oak and sycamore restoration areas. What is lacking in the documents is a detailed tree replacement exhibit showing exactly where within the former road corridor the replacement trees will be located.

vii. More Specificity is Required to Accurately Determine All Impacts to Recreation

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Other possible impacts on recreation are impossible to determine because of the lack of specificity in the plan. One good example is the shared horse waste disposal facility. There is no indication of where this will be placed within the horse boarding area or how large it will be.

e. Safety and Security Impacts

i. Paved Bike Path Would Attract High Speed Bicycling and Motorized Vehicles

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The Annex Plan states that the "bicycle loop is not for high speed bicycling." (Annex Plan p. 2-22.) The construction of a paved bike path was one of the main areas of controversy, as it would attract high speed bicycling. Historically, Hahamongna has been used by bicyclists on mountain and hybrid bikes. All three user groups, hikers, equestrians and bicyclists, have co-existed successfully in the park for decades. The likely existence of "high speed cycling" is a safety concern and the prevention of "high speed cycling" becomes an enforcement issue for the Police Department, neither of which is addressed in the Initial Study. In addition, the Initial Study does not state how motorized vehicles are going to be kept off the paved bikeway, a concern because motorcycles have already been seen on the paved bikeway in the vicinity of the Flint Wash Bridge.

The Initial Study does not discuss mitigation measures to address the adverse effects of high speed bicycles and motorized vehicles on the existing passive, long-established recreational uses of the park such as hiking, horseback riding and birdwatching.

ii. Critical Access Route to Main Arena is Omitted in Annex Plan

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Annex Plan Exhibit 3-2, Annex Master Plan Use Areas, Annex Plan Exhibit 3-3 Master Plan Area, and Exhibit 2.5, Proposed HMP Addendum Plan all leave out a critical access route around the main arena in what will become the public Equestrian Center. This omission was mentioned repeatedly in public comments. Without through circulation in the public area, horse trailers, some of which are as large as tractor trailers, will be forced to go through the horse boarding area creating a very unsafe condition. Activities including horseshoeing, grooming and tacking, veterinary care, and riding will be occurring in this very small area. The introduction of through traffic to this area has significant safety impacts which are not addressed in the Initial Study. In addition, the Annex Plan does not explain how the public is going to get its vehicles through the locked gate of what is identified in the plan as an area secured for the safety of the horses. The Plan should be corrected to include this important access route.

iii. Annex Plan Fails to Ensure Security of Equestrian Area

Initial Study p.3-60 “The HMP Addendum calls for the elimination of the main gate at the current primary entrance to the public equestrian area.” The gate is a protection to the park public in case a horse gets loose. It is also a protection for the animals who would be exposed to great danger should they get loose and wander outside the Equestrian Center. A comparison with other equestrian facilities will show that perimeter fencing and gates are very common for these safety reasons. The ability to lock up the Equestrian Center after hours is also important because expensive equipment for ring maintenance, etc. is stored in this area. The Annex Plan is inadequate in that it does not address either of these issues.

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4. Use of a Master CUP Would Violate CEQA

The Annex Plan includes “Apply for a ‘master’ Conditional Use Permit for the entire Annex site to facilitate the implementation of planned improvements” as the first next step after adoption of the Annex Plan. The use of a Master CUP for all projects within the Annex Plan would potentially allow those projects to evade the detailed environmental review that is required by CEQA. As discussed above, many of the impacts of the projects specified for the Annex property in the Annex Plan have not been analyzed in the Initial Study. CEQA only requires environmental review of projects when there is a discretionary approval. The Master CUP appears to be intended to be the last discretionary approval required for all of the projects specified for the Annex property by the Annex Plan. Thus, it would be the last opportunity to study, and more importantly mitigate, the impacts of those projects before they are implemented, and the impacts are experienced by park goers, wildlife, and the surrounding community. However, the preparation of detailed environmental review for these projects is not listed as a next step in the Annex Plan.

All of the impacts from the specifically detailed projects in the Annex Plan should be analyzed now since the City is committing itself to move forward with those specific uses of the Annex property when it approves the Annex Plan. In meetings with City staff, FOH has been told that its concerns that impacts from the specific projects listed in the Annex Plan were unfounded because the impacts of these projects would be studied on a case by case basis when each project came up for individual approval at a later date. The use of a Master CUP shows that projects would not be studied on a case by case basis at a later date, but instead would ostensibly receive all approvals required to begin implementation without any further environmental review.

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FOH’s position is that the environmental impacts of all Annex projects must be fully and adequately studied and are concerned that the application of a Master CUP would compromise the public’s future opportunity to review projects as they are implemented. The Planning Commission recommended that all projects identified in the August 3, 2009, letter from the FOH CEQA lawyer either must be studied now as part of the Annex Plan Initial Study OR receive future project-level specific, independent CEQA review. It is FOH’s opinion that the Master CUP approach, with general “streamlined” environmental review, will not permit the project-specific level of environmental review on a project-by-project basis recommended by the Planning Commission and others. It is FOH’s recommendation that the Master CUP language be removed from the Annex Master Plan, and, that all Annex projects be required to apply for and obtain separate CUPs with detailed and adequate project-level environmental review of each project.

B. Process Violations

1. Revised Annex Plan and Initial Study Fail to Follow Recommendations of Hahamongna Watershed Park Advisory Committee and Planning Commission

- Initial Study p. 4-1
The document states that “[A]s part of the proposed HMP Addendum, the City is considering a bikeway and (potentially) an adjacent but separate equestrian/pedestrian trail.” The trail in the northern corridor was to have been removed from the Annex Plan according to the final recommendation of the September 29, 2009 Staff Report to the Hahamongna Advisory Committee: “Eliminate the existing/proposed trail route along the northern edge of the public equestrian area... and reflect only the bikeway, consistent with the Planning Commission recommendation.” (Update and Consideration of Recommendations on the Hahamongna Watershed Park Master Plan Addendum for the Hahamongna Annex, p. 8). The Hahamongna Advisory Committee relied on Staff’s assertion in their final review of the Annex Plan that the trail would be eliminated.
- Annex Plan Exhibit 3-2, Annex Master Plan Use Areas, and Exhibit 3-3, Master Plan Area
Both exhibits show ONLY the Recreational Bikeway in the northern corridor. The text in the Land Uses and Anticipated Facilities section also does not refer to the trail. The Mobility section, however, includes the following: “Improve existing pedestrian/equestrian trail from the transit stop at the park entrance at Oak Grove Drive and Foothill Blvd. north, to and through the Annex.” p. 3-19. Even though references to the trail have been removed from the Annex Plan in the sections where the reader would expect to find them, the trail is still included in the Annex Plan, contradicting the staff recommendation in the September 29, 2009 Staff Report. The result is to make it almost impossible to know what is planned in the northern corridor.
- The same September 29, 2009 Staff Report as mentioned above states that “[T]ext in the IS will be modified to reflect the Planning Commission recommendation for the proposed bikeway alignment and therefore serve as the basis of the environmental review. Environmental evaluation of a trail, whether previously recommended by staff or any suggested alternative trail alignment will be removed.” (Update and Consideration of Recommendations on the Hahamongna Watershed Park Master Plan Addendum for the Hahamongna Annex, p. 8) In the final Draft Initial Study, Section 4.0 is a Focused Analysis of Bikeways and Trails and subsection 4.5 is an Environmental Evaluation of Bikeways and Trails, in direct contradiction to staff’s representations to the Hahamongna Advisory Committee. The Hahamongna Advisory Committee relied upon staff’s representations in the September 29 Staff Report in making its decision not to hold another meeting to give a final review of the completed Final Draft Annex Plan and Initial Study. Had the Staff Report correctly represented Staff’s plans for the language of the final draft documents, the Hahamongna Advisory Committee may well have made a different recommendation to Council after reviewing these documents in their entirety.
- If the northern corridor trail is an Annex project, then it must be included in the Annex Plan in the relevant exhibits as well as in the Land Use, Mobility, and other relevant sections. If the City is only “potentially” considering a trail adjacent to the bikeway, then the environmental review of this trail is not appropriate in the Initial Study and should be undertaken instead when the trail actually becomes a project.

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2. Numerous Version of the Annex Plan Create Confusion

From April 29, 2009 to November 20, 2009, a period of less than seven months, there were four different versions of the plan and the environmental document:

- Draft issued 4-29-09 Hahamongna Watershed Park Master Plan Addendum for the Hahamongna Annex
- Hahamongna Watershed Park Master Plan Addendum for the Hahamongna Annex last revised 6-2-09
- Hahamongna Watershed Park Master Plan Addendum for the Hahamongna Annex revisions made after 6-2-09
- Draft issued 11-20-09 Hahamongna Watershed Park Master Plan Addendum (Final)

The plan and the environmental documents which were reviewed by the various advisory bodies were different from one Commission to the next. One major change to the Annex Plan was even made after it had been reviewed by all the advisory bodies, all of which had approved a combined bike/hiking path. In the Final Draft, staff is recommending a “Bikes Only” path which was not a recommendation they had made at any of the advisory meetings. The documents which are going to the City Council are not the same documents which were reviewed and approved by the Commissions and the HWP Advisory Committee.

3. Conflicting Goals Regarding Preservation of Trees

In addition to the constantly changing documents causing confusion, staff took diametrically opposed positions in documents which were available to the public at the same time. Tree removal in the formerly proposed road corridor is a critical issue. In the first revision of the Annex Initial Study, trees are to be preserved as indicated by this statement: “While the proposed trail corridor is 30 feet in width... it is the City’s intent to align the trails in a manner that preserves as many existing trees as reasonably possible... the City estimates that the number of trees that would be impacted by the proposed improvements is in the range of 7 – 19 trees” (Initial Study Rev. 1 June 2009). This language remained in the Initial Study, and presumably posted on the Internet, until the Draft Initial Study replaced it on November 20, 2009. The Staff Report, prepared for the September 29, 2009 meeting of the Hahamongna Advisory Committee, included the opposite position, however: “The text in both documents will reflect that... all non-native California trees within the Annex will be recommended for removal.” (Update and Consideration of Recommendations on the Hahamongna Watershed Park Master Plan Addendum for the Hahamongna Annex, p. 8) This report was also available on the Internet.

C. Significant Changes to the Plan Have Been Made

1. There are several new projects that differ from those proposed in the Hahamongna Master Plan. There are others that were added to the Annex Plan after review by the advisory groups. These include:
 - a. Removal of all non-native trees within the Annex. A consistent message from the Committees and Commissions was that tree removal be limited as much as possible but this project was introduced into the Annex Plan after it was reviewed and commented on by all but the HWP Advisory Committee. Both the native and the non-native trees

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provide much needed habitat, especially since the Station Fire. Cooper's hawks have been known to nest on the Annex and numerous other nesting birds, including California Quail, make use of "non-native" trees and vegetation now slated for removal.

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- b. Use of the JPL bridge as a temporary bicycle route crossing. This project is outside the scope of the Annex Plan but constitutes a new project for the Hahamongna Master Plan that was not evaluated in the MEIR. The Initial Study (p.2-25) states "*The all-weather access for bicycles would take riders along the eastern edge of Hahamongna Watershed Park to the existing JPL bridge, temporarily and until the future northerly bridge crossing project is built to complete this northern missing link in the park's perimeter trail system.*" This is in direct conflict with the comments received from JPL during the circulation of the MEIR which state "*Using the JPL bridge as the North Bridge crossing for the perimeter trail is not favored because of the mixing of pedestrian, equestrian, bicycle and vehicular traffic on the bridge.*" (Final MEIR Vol III) and the Initial Study, quoting the Hahamongna Master Plan, (p.4-2) which states "*Bicycles will NOT be allowed on any designated trail or unpaved surfaces within the park nor on the existing JPL bridge crossing.*"

The inclusion of this new project is apparently in response to the public's question on where the continuation of the Annex bikeway would go and questions related to land use restrictions of the Spirit of the Sage Council settlement. Access to the bridge from the trail is a steep grade and very narrow, unsuitable for a 10 foot wide bike path. (Figures F5.) Although Staff has asserted that the bikeway through the Annex is necessary to complete the bicycle loop, it is apparent that there is still a significant "missing link" in the area covered by the Hahamongna Master Plan and the Spirit of the Sage Council settlement.

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- c. Exclusive use by bicycles on the Annex bikeway. This new restriction apparently prohibits pedestrians from using the bikeway and no clear alternative has been presented. At all the Commission and Committee meetings, a bike/hiking path was discussed in the northern corridor. Many JPL employees use this route to walk to JPL and for lunch hour recreational walks. As proposed, JPL walkers coming from the JPL Connector Trail now cannot head east or west along the bikeway and would not be able to cross the bikeway into the public area due to "no climb" fencing that will be put in place to separate the bikeway from the public equestrian area (Initial Study, p. 4-2).

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- d. Parking at the equestrian staging area. Although the Equestrian Staging Area improvements were removed from the Hahamongna Master Plan, there is now a plan proposed for 20 parking spaces in this location that could also be used for Annex supplemental parking. This is outside the scope of the Initial Study and would be a new project in the Hahamongna Master Plan

D. Problems with Staff Recommended Bikeway

1. Likely the Bikeway Could Not Complete Recreation Loop Around the Park

The bikeway project on the Annex has been touted by staff as being necessary to complete the bicycle recreation loop around the Hahamongna Watershed Park. However, the continuation of the bikeway north of the Annex area is in question due to the Spirit of the Sage Council Settlement. The Spirit of the Sage Settlement Agreement designates areas of the Hahamongna Watershed Park outside of the Annex as Natural Open Space. The agreement limits use of areas designated as Natural Open Space to "appropriate, passive recreation activities." Trails are not to be paved in these areas and the legality of the use of bicycles at all in these areas is questionable. The extension of the bikeway beyond the Annex property to the north may be prohibited by this agreement because they are designated as Natural Open Space areas.

The temporary bikeway, a new project in the Hahamongna Master Plan, would also be prevented from forming a complete loop around the Park by the narrow JPL bridge. The approach to the bridge is steep and narrow and surrounded by rugged terrain which would require significant grading and fill to convert to a 10 foot wide bicycle access (Figure 5). Alterations to the bridge abutment would need to be made to remove a raised curb and a narrow chain-linked gate. Mitigation measures may be necessary on the bridge to address possible bicycle traffic conflict with commuter vehicular traffic.

The bikeway project for the Annex property should not be approved until it can be determined whether there is an acceptable continuation route that complies with the Spirit of the Sage Council Settlement, the Hahamongna Watershed Park Master Plan (p. 3-47) and comments from JPL included in the Arroyo Seco MEIR.

2. Bikeway Should Be Designated For Shared-Use

A significant change was made to the bikeway project AFTER it was reviewed by all the advisory bodies in that the corridor is no longer shared-use for pedestrians. The bike-only restriction to the bikeway project may significantly reduce grant opportunities for this project, as grants often support "shared-use". Bikeways constructed with transportation funding must conform to the Caltrans Highway Design Manual which defines Class 1 bikeways as separated rights of way for bicyclists and pedestrians. Potential funding sources are further reduced because the "Bikes Only" bikeway will not be ADA accessible. According to the Hahamongna Master Plan "the majority of the bicycle route will be ADA accessible (Hahamongna Master Plan, p.3-69). If the 800 foot long section of the bikeway on the Annex were also ADA accessible, this could potentially provide more grant opportunities.

E. Costly reconfiguration / relocation of the main, jumping, and oval arenas is unnecessary

1. Reconfiguring arenas involves the following time consuming and costly steps, which may result in potentially significant impacts:

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- a. Excavation of underground electrical and water lines attached to the arena rails, removal of existing rails and removal of the light poles on the main arena.
 - b. Scraping off the existing surface, removal of tons of the underlying hardpan.
 - c. Grading of new arena location/configuration
 - d. Building the reconfigured arena which will require large amounts of clay, crushed limestone, and washed sand which is very expensive.
 - e. The rails will need to be re-anchored, the water and electrical underground infrastructure replaced and the light poles for the main arena and sprinklers for the main and jumping arenas will need to be replaced
2. 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.
 3. The stated objectives of the Annex Plan can and should be met without the expensive reconfiguration of the public equestrian area and the jumping arena. The Annex Plan fails to disclose any reason why this relocation would be necessary.

F. Reorganization of horse boarding area appear to be included to allow future road construction

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1. The Annex Plan states that the re-grading and reconfiguring of the horse boarding areas is being done to improve drainage (p. 3-15). **An exhibit prepared by Moore Iacofano Goltsman, Inc during the Annex planning process shows instead that the regrading and reconfiguring of the horse boarding area is actually being done for circulation purposes related to the formerly proposed road (Figure 1).** The February 2008 exhibit, entitled "Vehicular Road/Trail/Parking Connections", shows the road through the northern corridor with an arrow pointing toward the JPL west parking lot. This proposed road is shown as connecting with a realigned access route along the eastern edge of the horse boarding and youth camp areas where stalls are now located. Since the northern road through the corridor has been taken out of the plan, however, there is no longer any project in the plan that requires this expensive infrastructure relocation.
2. 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. Realignment of 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. For clarification purposes, Rose Bowl Riders owns the clubhouse, the wood barn (currently leased to MACH I), all the arenas, the tack/feed barn, the trainer barn (8 stalls), the guest stalls in the upper area, the tractors and all of the supporting infrastructure. The boarding stalls in the lower area, with the exception of the trainer barn, are owned by individual club members. The Plan needs to address how acquisition and/or control of these facilities will be

managed and compensated for

3. 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 Annex Plan 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 be a significant cost to the City.
4. 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 formerly proposed road in the northern corridor has a long history (Chronology, Appendix A-4). If the projects proposed in the equestrian boarding areas and others, such as the wholesale removal of non-native trees, are being done to facilitate the building of this road at some future date, this need to be made public at this time so that the road's impacts can be studied cumulatively with the other projects proposed for the Annex and the rest of Hahamongna. If it is the intent to include this road in the Annex in the future, it must be studied now, or it will run afoul of CEQA's prohibition on project segmentation. "A public agency is not permitted to subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole." (*Orinda Assn v. Board of Supervisors* (1986) 182 Cal.App.3d 1145, 1171.)
5. The Annex Plan 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 Annex Master Plan to allow the public and decision makers to assess its adequacy.

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G. Planned Development Zoning Unnecessary

At the July 24 meeting, FOH 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 West Parking Lot. The Planning Commission, when it reviewed the Annex Plan, was also in favor of rezoning this portion of the Annex to Open Space. Staff's assertion is that rezoning the Annex to Open Space will put the JPL parking lease in jeopardy. The portion of the PD area located on the Annex is 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.

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H. The Annex Plan and Initial Study Fail to Include All Available Parking

Not all available parking for Annex property use is documented in the Annex Plan and the Initial Study. There are 200 spaces of the JPL east lot which will be available for public parking according to the Hahamongna Master Plan (Hahamongna Master Plan, p.3-60) that are not included in either. Staff states that these spaces were omitted because they are more than a half mile from the Forest Service administrative building. However, the distance from the northeast corner of the Annex to the parking spaces has been measured at 2360-ft, well within the 2800-ft distance which staff has chosen as a reasonable walking distance (Initial Study, p.3-62) and well within a half mile of most of the activities planned for the Annex. These spaces should thus be considered available parking for the Annex property.

V. Inconsistencies in Annex Plan and Initial Study

Annex Plan Exhibit 3-2, Annex Master Plan Use Areas

- The use areas shown do not correspond with what is in the text of the document. The exhibit shows four use areas, A – D, when the text describes six, A - F. The Use Areas discussed in the text of the document but not delineated on the exhibit are E. - Recreational Bikeway and F. - Common Areas.

Annex Plan Exhibit 3-2, Annex Master Plan Use Areas, and Annex Plan Exhibit 3-3, Master Plan Area

- These illustrations are inconsistent in their depiction of the bikeway and the Perimeter Trail. Exhibit 3-2 shows them diverging as they go north into the park. Exhibit 3-3 shows the Perimeter Trail taking an rectangular jog and then running parallel to the bikeway north up into the park. Neither exhibit shows the Perimeter Trail as it was approved in the Hahamongna Master Plan, Exhibit 3-8 Trail Plan, p.3-44. The rectangular jog in the Perimeter Trail appears to move it out of the way of a future vehicle access to the JPL west parking lot, which is not an alignment adopted in the Hahamongna Master Plan. If there are future projects, such as the formerly proposed road, which would require the modification of the Perimeter Trail alignment, these need to be disclosed and their environmental impacts studied at this time.

Annex Plan Exhibit 3-2, Annex Master Plan Use Areas, and Annex Plan Exhibit 3-3, Master Plan Area

- Both these exhibits show the Perimeter Trail as being partially on the Annex and partially in the park. However, Exhibit 3-4, Mobility shows the Perimeter Trail as entirely within the boundaries of the Annex.

Annex Plan p.3-11

- The recommendations for the Environmental Education Center (EEC) and those for the Equestrian Center differ concerning adaptive reuse. The EEC recommendation is “Existing structures will be retained for reuse to the greatest [sic] possible and to minimize demolition.” The recommendation for the Equestrian Center is “Where possible, the adaptive reuse of existing structures will occur.” It is a significant inconsistency that minimizing demolition is a recommendation for the EEC but not for the Equestrian Center. It appears the clubhouse is the only structure on the property mentioned for possible demolition and replacement and no justification is presented.

Annex Plan p.3-14

- Non-native tree/shrub removal is encouraged. “Any removals shall be done in a phased approach as Annex projects are funded and implemented over the course of the project.” The bikeway project as recommended by the Planning Commission required the removal of only four trees. Staff’s original proposal only required the removal of 19 trees. The final staff recommendation included the removal of 70 trees including 33 in the formerly proposed road corridor. Initial Study Table 4.2, “Trees Impacted by the Bikeway and Trail Along the Northern Property Boundary” includes trees which are NOT impacted by either the bikeway or the trail project. These trees do not have to be cut down for the project but rather are merely in the road corridor. It is inconsistent to state that non-native trees will be removed as projects are undertaken and then include the removal of trees which are not necessary for the implementation of any identified project. If there are future projects, such as the formerly proposed road, which would require the removal

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b85 [of all 33 non-native trees, then these projects need to be disclosed and their environmental impacts studied at this time.

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b86 [• All the 70 non-native trees on the Annex that are to be removed for habitat restoration need to be included in this Table, not just the trees identified in the formerly proposed road corridor.

Initial Study p.2-25

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b87 [• The document states that “the all-weather access for bicycles would take riders... to the existing JPL bridge.” As the Initial Study correctly notes on p.4-2, however, the Hahamongna Master Plan states that “[b]icycles will not be allowed on any designated trail or unpaved surfaces within the park nor on the existing JPL bridge crossing.”

VI. Errors Found in Annex Plan and Initial Study

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Table of Contents - Annex Plan

- The Appendices are not listed
- Under 3.2 Land Uses and Anticipated Facilities, "E. Recreational Trail Greenway" should have been changed to "Recreational Bikeway" to correspond with the text.

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Annex Plan p.2-9

- The width given for the Northern Trail corridor, 8 to 18 feet, is incorrect, as was pointed out in public comments several times. The existing trail corridor from fence line to fence line actually varies in width from 7 feet to over 25 feet. (Figure F6)

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Annex Plan p.2-9

- The JPL Connector Trail has two very large mature oak trees on it not one as is stated in the document, (Figure F4). The trail corridor in the vicinity of these trees is much less than the stated 13 feet as is stated.
 - The northern oak tree has three trunks, 26", 22", and 20" inches and a 5'8" diameter at 4.5-ft high. The trail is 1' 6" wide on the west side and 3' 6" on the east side in the vicinity of this tree.
 - The southern oak tree has a diameter of 3' 2" at 4.5-ft high and a circumference of 128" The trail is 4-ft wide in the vicinity of this tree.

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Annex Plan Exhibit 3-2

- Incorrectly depicts the alignment of the Perimeter Trail and the bikeway north of the Annex along the east side of JPL According to the Hahamongna Master Plan, the trail and the bikeway do not diverge as indicated on the Annex Plan Exhibit. Hahamongna Master Plan, p.3-45 states "a paved bicycle trail will parallel the Perimeter Trail on top of the existing sloped concrete flood revetment adjacent to the west JPL parking area to the North Bridge Crossing".
- The Hahamongna Master Plan p.3-42 states "the Perimeter Trail will serve as a delineator, separating the stream and its associated restored habitats... from areas of concentrated recreation activity". Hahamongna Master Plan p.3-47 states that specific trail segments will be abandoned including "all trails below the Perimeter Trail elevation in the restored habitat and the flood management/water conservation pool areas". Exhibit 3-2 illustrates a trail heading off into the habitat restoration area in conflict with the trail plan as adopted in the Hahamongna Watershed Park Master Plan and should be corrected.

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Annex Plan Exhibit 3-5

- Parking Areas are incorrect as was pointed over several times during public comment. There are 200 spaces of the JPL east lot which will be available for public parking according to the Hahamongna Master Plan (p.3-60).
- Although the Equestrian Staging Area improvements were removed from the Hahamongna Master Plan, there is now a plan proposed for 20 parking spaces in this location which could also be used for Annex supplemental parking. Neither of these parking areas is shown in the Exhibit 3-5 Table which lists "Other Future Parking within HWP."
- Staff states that these spaces were omitted because they are more than a half mile from the Forest Service administrative building. The distance from the northeast corner of the Annex to the parking spaces, however, is only 2360-ft, measured with a wheel on the existing trail across the Arroyo. This is well within the 2800-ft distance which staff has

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chosen as a reasonable walking distance (Initial Study, p.3-62) and well within a half mile of most of the activities planned for the Annex.

- The Hahamongna Master Plan calls for improvements to the Perimeter Trail and building a northern bridge crossing which will make the JPL east lot spaces even more easily accessible.

Annex Plan p.2-23

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- The Plan states that organized equestrian activity on the Annex dates “as far back as sixty years ago.” Organized equestrian activity on the Annex can be dated back almost eighty years to the 1930s when the Oak Grove Riding Academy was located approximately where LA County Fire Camp 2 is located today (1930’s Map of La Canada reproduced in Images of America: La Canada, Arcadia Publishing, 2006, p.123)

Annex Plan p.3-9

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- There is a significant error in the acreage of the Equestrian Center. The Center, described as “a horse riding, staging, teaching and boarding facility for the City” is not 3.6 acres but is actually 8.05 acres. The breakdown is as follows:

- 3.05 Acres Riding arena and Equestrian Staging Area (Initial Study, p.2-20)
- 2.3 Acres Horse boarding area (Annex Plan, p.3-10)
- 1.9 Acres Youth Camp (Annex Plan, p.3-10)
- 0.8 Acre Therapeutic Riding Center (Annex Plan, p.3-11)

Annex Plan p. 3-12

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- One of the Recommendations for natural open space is to restore the oak woodland while retaining the “existing recreational hiking trail.” This trail is not solely a hiking trail and should be referred to either as a recreational trail or as a hiking/equestrian trail.

Annex Plan Exhibit 3-5

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- Parking Areas, p.3-20, uses an outdated map from an earlier version of the plan which does not show the correct circulation around the Annex. The route in the public Equestrian Area is incomplete and the route in the Horse Boarding Area is incorrect in that it extends out to what would have been the location of the new road on the Annex. Since the road was removed from the plan, this access route was eliminated beyond its current length.

Initial Study p.2-20

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- Table 2.3 Equestrian Facility Components lists the jumping arena in the Public Equestrian area. The jumping arena is actually located in what will become the horse boarding area. To move this arena to the Public Equestrian area will involve considerable cost and will require the entire reconfiguration of all the arenas in the upper area.

Initial Study p.2-20

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- The acreage of the Equestrian Center is listed incorrectly as 6.74 acres instead of 8.05 acres.

Initial Study p.4-1

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- The Linda Vista Annandale Neighborhood Association did not have a representative at the June 4, 2009 meeting between city staff and Friends of Hahamongna.

Initial Study p.4-1

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- Reference is made to an “existing natural surface trail” along a driveway that would be maintained for equestrian and pedestrian use. There is no existing trail along the Rose Bowl Riders driveway. If the document is referring to the existing trail between Rose Bowl Riders and County Fire Camp 2/JPL, the bikeway is planned for this alignment.

Initial Study p.4-5

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- The Perimeter Trail does not connect to any “trails on the east side of the JPL campus.” The campus is fenced in. This same error is repeated on p.4-6.

Initial Study p.4-6

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- The existing Hahamongna Master Plan does NOT designate the Perimeter Trail as “a 12-ft wide, non-bicycle, multi-use trail.” All the numbers were taken out of the final Hahamongna Master Plan and the Perimeter Trail was defined as “an all-weather, permeable surface roadway” looping around the entire basin for hikers and equestrians and providing internal access for emergency and maintenance vehicles (p.3-42.) In the Redline Version of the Hahamongna Master Plan which still showed the trail widths, the Perimeter Trail is described as a 12 to 16 foot wide loop (p. 3-45).

VII. Additional Inadequacies in Annex Plan and Initial Study

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Annex Plan p.1-3

- The description of the Rose Bowl Riders facilities omits the small oval arena, the turnout pen, the round pen and the barn which currently houses MACH 1 and an equipment storage area.

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Annex Plan p.1-6

- The timeline does not describe what happened at the 4th Community meeting on the Annex held 6/20/2006 but rather describes what was supposed to happen. Results of the design charrette were to be discussed and the purpose of the meeting was to “generate feedback about the charrette result to guide the development of a preferred alternative.” There was a printing equipment malfunction, however, and the charrette results were not distributed. Another meeting was never scheduled for community feedback so the preferred alternative was developed by staff.

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Annex Plan p.2-9

- The description of the JPL Connector Trail states that it is primarily used by JPL hikers. The trail is also used by JPL bicyclists and by members of the public who have access to it via the Class II bikeway on Oak Grove Drive and Forestry Camp Road.

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Annex Plan p.2-23

- In the Buildings and Amenities section, the Annex Plan neglects to mention that the Rose Bowl Riders clubhouse was built even earlier than the Forest Service buildings. The City of Pasadena donated two obsolete buildings which members of Rose Bowl Riders renovated and rebuilt on the property in 1952 – 1953 Figure F7 “[Pasadena Officials] Approve Project” Pasadena Star News, March 29, 1953.

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Annex Plan Exhibit 3-2

- Annex Master Plan Use Areas, Annex Plan Exhibit 3-3 Master Plan Area, and Exhibit 2.5 Proposed HMP Addendum Plan These exhibits leave out a critical access route around the main arena in what will become the public Equestrian Center. This omission was mentioned repeatedly in public comments.

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Annex Plan p.3-13

- The statement related to emergency access is misleading. Although the hard surface bikeway alignment will be capable of supporting “access by small motorized maintenance/emergency vehicles,” emergency/maintenance access to the park is provided on the Perimeter Trail which is defined in the Hahamongna Watershed Park Master Plan as “an all-weather, permeable surface roadway” looping around the entire basin for hikers and equestrians and providing internal access for emergency and maintenance vehicles (Hahamongna Watershed Park Master Plan, p.3-42.)
- One of the justifications used for building the formerly proposed road across the Annex was as a possible emergency access route. In fact, the emergency route adopted in the Hahamongna Master Plan is shorter, allowing quicker access to the interior of the park. The emergency route by Sycamore Field on park roads and the Perimeter Trail, the route adopted in the Hahamongna Master Plan, is 3485 feet long. The park roads and the formerly proposed Annex road would be 3622 feet long.
- The Annex Plan should be corrected to clarify that the Perimeter Trail is the adopted emergency access route for Hahamongna, according to the Hahamongna Master Plan.

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Initial Study, p.3-14

- Within the section on the Natural Environment, the Initial Study states that emergency/maintenance access needs to be located above 1045 to avoid seasonal inundation. Why this information is included in the Annex Initial Study is unclear since the Perimeter Trail, the emergency route adopted in the Hahamongna Master Plan, “will have a minimum elevation of not less than 1045 msl (4.5 feet above the 1040.5 msl spillway elevation so that it can be accessed during most storm events,” (Final Arroyo Seco Master Environmental Impact Report, p.A-17)

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Annex Plan Exhibit 3-4

- The Mobility Exhibit is incomplete. The map includes all the existing and proposed trails in both the Annex and the larger park. The map only includes the addition to the bicycle route on the Annex, however, and does not include both the existing and proposed bicycle route sections in the park. If the exhibit is intended to show mobility, it should include the entire bicycle route just as it includes all the trails. The same incomplete bicycle route is also shown in the Initial Study Exhibit 2-7.

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Initial Study, p.2-20

- Table 2.3 Equestrian Facility Components includes as a potential improvement, “modify/repair/relocate existing Oval Teaching Arena as may be required to implement other Master Plan components.” There are no other Master Plan components that would impact this arena if the northern trail has been removed from the plan. There is no compelling reason why this arena should be impacted for habitat restoration alone. If there are future projects, such as the formerly proposed road, which would require the relocation of the oval teaching arena, they need to be disclosed and their environmental impacts studied at this time.

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b112

Initial Study, p.2-21 and 2-22

- The areas of the equestrian boarding area (88,065 sq. ft), adaptive/therapeutic (36,795 sq. ft) and youth camp (70,818 sq. ft.) are known with great precision. The boundaries for the three subareas are not shown on Exhibit 3-2. They can and should be shown in the Annex Master Plan Use Areas.
- It is unclear why no exhibit in the Annex Plan or the Initial Study shows the use area falling within the portion of the property zoned Planned Development. Earlier exhibits showed almost an exact correlation between the PD zone and the equestrian boarding area. If the usage areas are already known to the point of determining square footage, the boundary information of all the use areas can and should be included in the Annex Plan.

FOH
b113

Initial Study p.2-23

- The statement that equestrian activity will be restricted in the oak woodland area needs to be clarified. Many of the equestrian/hiking trails run through oak woodland areas. If this section is referring to off-trail activity that should be made clear.

FOH
b114

Initial Study p.3-60

- The document refers to the “current primary entrance to the public equestrian area” but includes no information concerning where the new primary entrance to the equestrian area will be. There is no way to assess the impacts of vehicle circulation changes, especially on safety, without this information.

FOH
b115

Initial Study, Appendix D, pp.9-12

- In the Final Traffic Impact Study prepared for the City by Linscott, Law and Greenspan, total parking demand for special events on the Annex is estimated to be 237 spaces. This estimate of parking needs was based on “information provided by the City of Pasadena Parks and Natural Resources Division...” Although the document is not identified by

**FOH
b115**

name, the “information provided” is found in the “(Draft) Summary of Carrying Capacity Analysis” which is attached below as Appendix 6. This document is interesting in that it shows that the figure of 237 parking spaces for special events was arrived at because, in general, a medium level of intensity was chosen rather than a low level of intensity of use. Had a low level of intensity of use been chosen, the total parking demand for special events would have obviously been lower. Low intensity of use was repeatedly preferred by the community and the advisory groups. For instance, when the Annex conceptual plan with its 50 foot wide roads and corridor originally came before the HWP Advisory Committee, they directed staff to return with an option less than Option A the least impactful of the three alternatives. The Initial Study is inadequate in not including this document because parking needs may in the future be used as a justification to build a road through the Annex to the JPL West Parking Lot. The Carrying Capacity Analysis should have been made available as part of the Initial Study since it shows that the need for more parking is not inevitable but rather based upon certain decisions made by staff.

- As the Annex projects are completed, the Carrying Capacity Analysis should be available for review and revision. If the intensity of use chosen turns out to be so high that supplemental parking is needed, there may be pressure to build the road through the Annex. Another alternative, which would be preferred based upon the community’s desire for “no road,” would be to decrease the intensity of certain activities at the Annex or elsewhere in the park so that existing parking would suffice.

VIII. The Focused Environmental Review Fails to Accurately Compare the Alternative Alignments

A. *Friends of Hahamongna Proposed Alternatives to Limit Impacts*

Table 4.1 "Focused Environmental Evaluation of the Bikeway and Trails Considered During the Master Plan Addendum Process" gives the impression that a number of different alternatives were studied during the Addendum planning process. All the alternatives listed except the first, "Bikeway and Trail Along the Northern Property Boundary," were actually proposed, not by the City, but by the Friends of Hahamongna, a citizens' support group for the park (Figures 8 and 9).

FOH came up with several different proposals to show that there are a number of different alternatives that would have far less environmental impact than the proposed alternative. The public, however, had no meetings to evaluate these various alternatives nor were they able to see them in advance of the meetings at which they were presented. There was no opportunity for the public to compare and contrast the alternatives and to give input as to which they preferred. All of the meetings held were Committee meetings at which the public had only three minutes each to speak. Because of the controlled format, there were questions which were asked repeatedly by the public regarding different alternatives which were never answered. With the exception of Sub-Trail Option 1, none of the alternatives were presented as such in the final proposed Annex Plan.

FOH
b116

B. *Staff Preferred Alternative Continues to be Unnecessarily Wide Corridor*

From the very beginning of the process, all the alternatives given by the City were either a road or a trail/bikeway wide enough to become a road at a future date, despite the widespread protests against a road during the park planning process. Two of the alternatives were in the northern boundary corridor. The third was an 1800 foot access road which would have connected the primary park road east of the existing Oak Grove Field to the JPL west parking lot via a new road to be built on the Perimeter Trail, ("OVERVIEW: Proposed Access, Circulation and Parking Options Hahamongna Watershed Park Annex", p.2, undated). This road which the staff proposed would follow the same route as the Perimeter Trail/bikeway which was suggested by the Friends and then rejected by the City, ("Proposed Access, Circulation & Parking: Option B, Hahamongna Watershed Park Annex", March 24, 2008). Table 4.1 does not explain why building a road would have been environmentally acceptable when building a bicycle path in the same location was rejected as having too great an environmental impact!

FOH
b117

C. *Impacts for Alternatives are Inadequately Addressed*

The Focused Environmental Review (Table 4.1 of the Initial Study) compares the Staff recommended alternative to three alternatives presented by FOH. The failure of this analysis demonstrates why project alternatives are more appropriately analyzed in an EIR, instead of the Initial Study proposed for the Annex Plan. Additionally, in attempting to justify its preference for the Staff recommended alternative, the Focused Environmental Review fails to accurately state impacts from the recommended alternative. For example:

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b118

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- The Initial Study stresses the importance of separating bikes from equestrian/pedestrian uses in the 800 foot corridor on the Annex. However, no other portion of the bikeway loop proposed for Hahamongna Watershed Park separates uses, even though several other locations, including the Flint Wash Bridge, require side-by-side use.
- The Initial Study stresses the importance of providing barriers or buffers between uses yet no other area of the proposed route has barriers planned.
- The Initial Study states that the bikeway needs to “meander” but no other area of the proposed route “meanders”.

D. Bikeways in Other Areas of Arroyo Seco Rely on Existing Infrastructure to Reduce Impacts

FOH
b119

The proposed bikeway through the Annex area establishes standards that far exceed the remaining portions of the proposed recreational bike loop approved in the Master Plan. The proposed Annex bikeway will be exclusive use, 10 feet wide, smooth paved surface with barriers and/or buffers between the bicycles and other users in the area. The approved bikeway in the Master Plan makes use of existing roads, crossing through the JPL east parking lot, and sharing the JPL access road, Windsor Ave, and La Canada Verdugo Road with pedestrians and vehicles. Likewise, the south-west to north-west portion of the approved Master Plan bike loop is on existing park roads and must be shared with equestrians, pedestrians, and vehicles. The Flint Wash Bridge is 12 feet wide and must be shared by all users without the benefit of barriers.

E. Separation of Uses Not Required Elsewhere in Hahamongna Watershed Park Bikeways/Trails

FOH
b120

There are several background facts which are helpful in assessing the information in Table 4.1. The Initial Study stresses the importance of separating bikes from equestrian/pedestrian uses in the 800 foot corridor on the Annex, p.4-2. In reality, however, the bikeway on the Annex is the only location in Hahamongna where a wide corridor is planned so that the user groups will be separated.

There is no other bikeway location within Hahamongna where bicyclists are not immediately adjacent to other users nor is there any other location where a divider is called for. In the southern end of the park in the vicinity of the Devil’s Gate Dam and the Flint Wash Bridge all users groups travel together for over 1250 feet with no dividers or buffers of any kind. This is 450 feet longer than the segment on the Annex. On the approaches to the bridge they share a 12 ft wide asphalt bikeway with a four ft wide dirt shoulder (Figure 11). The bridge itself is only 12 ft wide. For 560 ft, the corridor is no wider than 16 ft.

Staff reports state that this is the only instance in the park where bikes, pedestrians and equestrians share a side-by-side multi-use trail. This is incorrect. According to the Berkshire Creek grant application, the park road to a group picnic area is being removed to be replaced by a “Multi-use park trail.” A 12 foot paved bikeway is shown immediately adjacent to the hiking/equestrian trail (width not given) leading to this picnic area. (Figure 12.) There are no dividers of any kind called for in

the grant request, ("The Restoration of Berkshire Creek in Hahamongna Watershed Park", City of Pasadena, Department of Public Works, Parks and Natural Resources Division, November 2008).

In the adopted Hahamongna Master Plan, the bikeway and trail north of the Annex alongside JPL are immediately adjacent to each other. "A paved bicycle trail will parallel the Perimeter Trail on top of the existing sloped concrete flood revetment adjacent to the west JPL parking area to the North Bridge Crossing." p.3-45 (See Hahamongna Master Plan, Exhibit 3-8, Trail Plan and Hahamongna Master Plan, Exhibit 3-9 Bicycle Route.) There is nowhere in this segment that a trail/bikeway could even begin to approach the width of the Annex 30 feet wide corridor. The width of the corridor north of the Annex varies from 12 feet at its narrowest to about 24 feet at its widest. The bikeway/trail in this location will have to be 8 feet/4 feet at the narrowest point. There is no way to widen the corridor since it is bounded by the JPL parking lot on one side and the concrete revetment and sensitive habitat on the other.

These facts raise many questions:

- Why would the Annex be the only location in the park which would require more than about 16 to 20 feet for a combined bikeway/trail?
- Why is it the only location where user safety is invoked to justify a wider corridor?
- Why are the Arroyo Seco Design Guidelines which suggest a physical barrier only mentioned concerning the bikeway on the Annex and ignored on all the rest of the route? (IS, p4-2)
- Why must the bikeway "meander" on the Annex, when it is straight as an arrow in the rest of the park? See Annex Plan Exhibit 2-7 which shows the bikeway as proposed in the Hahamongna Master Plan. (Note that the meandering section shown in this Exhibit is actually where the bike route goes out onto an existing park road.)

If there are future projects, such as the formerly proposed road, which are the real reason for the construction of the bikeway/trail in the manner described in the Initial Study, then these projects need to be disclosed and their environmental impacts studied at this time.

F. Inadequate Reasons are Given for Rejecting Alternatives Proposed by Friends of Hahamongna

The following comments refer to points raised specifically in Table 4.1 concerning the Perimeter Trail/Bikeway and Sub-Trail Option 2.

1. Perimeter Trail/Bikeway

The Perimeter Trail/Bikeway analysis states that there would be 18,000 sq feet of new bikeway surface vs. 8000 sq ft for the Annex bikeway. In actuality, the bikeway could be built ON the Perimeter Trail and require no additional square footage whatsoever. The Annex Plan states that the "bikeway shall be a maximum of 10 feet in width and trails shall be 4 to 8 feet in width" Annex Plan p. 3-19 As

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b121

noted earlier, the Perimeter Trail was proposed to be up to 16 ft wide in the Hahamongna Master Plan. A 10 foot wide bikeway could be built with an adjacent 6 foot equestrian/pedestrian trail. Thus, the Perimeter bikeway would require no changes from what has already been studied in the Master Plan and would have no additional environmental impacts other than what has already been studied in the MEIR. The Annex bikeway/trail by contrast would have a greater environmental impact because it would require a new 8000 sq ft which could not be devoted to habitat restoration.

FOH
b121

Furthermore, the bikeway surface proposed in the Addendum – “permeable” and “sustainable” p. 3-13 is not unlike the Perimeter Trail surface proposed in the Hahamongna Master Plan – “an all-weather, permeable-surface.” (HWP Master Plan, p.3-42.) The Design Commission recommended that granular stone be used for the bikeway, a surface which would also meet the plan’s requirements for an all-weather, permeable surface for the Perimeter Trail.

The objection might be made that the Hahamongna Master Plan calls for a 12-foot wide Perimeter Trail. There are other approved segments of the Perimeter Trail, however, which will be narrower than 12 feet. As discussed above, the Perimeter Trail and the bikeway north of the Annex will be located in a corridor that varies in width and is as narrow as 12 feet in one location which suggests an 8 foot bikeway and a 4 foot trail. The Perimeter/Trail Bikeway alternative put forth by the Friends simply suggests that what was approved in the Hahamongna Master Plan north of the Annex be continued 1800 ft southward so that bicyclists can access the bikeway on the existing park roads. This is the environmentally superior proposal which results in minimal environmental impacts and much lower costs for the City.

FOH
b122

As the Friends of Hahamongna pointed out, the Perimeter Bikeway could be constructed so that it is entirely located on the Annex property and outside the natural areas covered under the City’s settlement agreement with the Spirit of the Sage Council.

Table 4.1 states that the Perimeter Trail Bikeway “extends into largely undeveloped portions of the Arroyo.” (Initial Study, p. 4-11.) This is true of the City’s proposal for the perimeter/trail bikeway north of the Annex which was adopted in the Hahamongna Master Plan. It is not true of the segment proposed by the Friends of Hahamongna which would be located on the Old Quarry Road, as noted above (Figure 10).

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b123

One of the goals of the Hahamongna Master Plan is to “locate new facilities in developed or disturbed areas so as to minimize impact to established habitats (Annex Plan p.1-8.) The bikeway/trail on the Annex northern property boundary disturbs a long-established landscaped area along the trail as well as a large area of native habitat known to be a location where California quail nest. The bikeway on the Perimeter Trail would go on what is known as the Old Quarry Road which served the mining operations in the basin and was not “carved out” by equestrian usage as the Initial Study states p.4-6.

FOH
b124

The Initial Study states that portions of the Perimeter Trail Bikeway lie below 1040.5 feet in elevation. This is puzzling because Annex Plan Exhibit 2-5 Water Elevations does not show the segment proposed by the Friends to be below this elevation. In addition, the Perimeter Trail as adopted in the HWP Master Plan is planned to “have a minimum elevation of not less than 1045 msl (4.5 feet

FOH b124 | above the 1040.5 msl spillway elevation so that it can be accessed during most storm events,” (Final Arroyo Seco Master Environmental Impact Report, p. A-17)

2. Sub-Trail Option 2

FOH b125 | Sub-Trail Option 2 is a short trail which would provide direct access from the Perimeter Trail to the Public Equestrian Center. It would go between the Horse Boarding and Youth Camp areas and then turn north on an existing trail to reach the Equestrian Center. Since it would go between two areas where horses are stabled, fencing would be required for security purposes. Table 4.1 states that Sub-Trail Option 2 requires 550 ft of fencing which would have an adverse aesthetic impact. The northern property boundary bikeway/trail requires 800 ft of fencing but the Initial Study fails to include that fencing as an adverse aesthetic impact.

FOH b126 | The biological impacts of Sub-Trail Option 2 are misstated. The existing trail that is proposed to be used is the same trail that is shown as the Horse boarding/youth camp loop trail so there are no additional environmental impacts along most of its lengths. The segment of new trail through the habitat restoration area would be only the portion on the slope - approximately 240 sq ft (6 ft wide by 40 linear feet) not 1200 sq ft as stated.

Sub-Trail Option 2 would benefit equestrian users coming from Pasadena and Altadena since they could enter the public Equestrian Center directly.

IX. CONCLUSION

FOH
b127

After careful study, FOH believe there are many problems with the proposed Annex Plan and Initial Study. Due to the importance of this area for both habitat and recreation, careful attention should be given to any plan for the Annex as it will commit the City to a future course of action. The proposed Annex Plan should be revised to eliminate the objectionable projects and an EIR should be prepared to ensure all adverse environmental impacts have been disclosed and mitigated.

Figures F1 to F12

Figure F1 HWP Annex Vehicular Road/Trail/Parking Connection, MIG

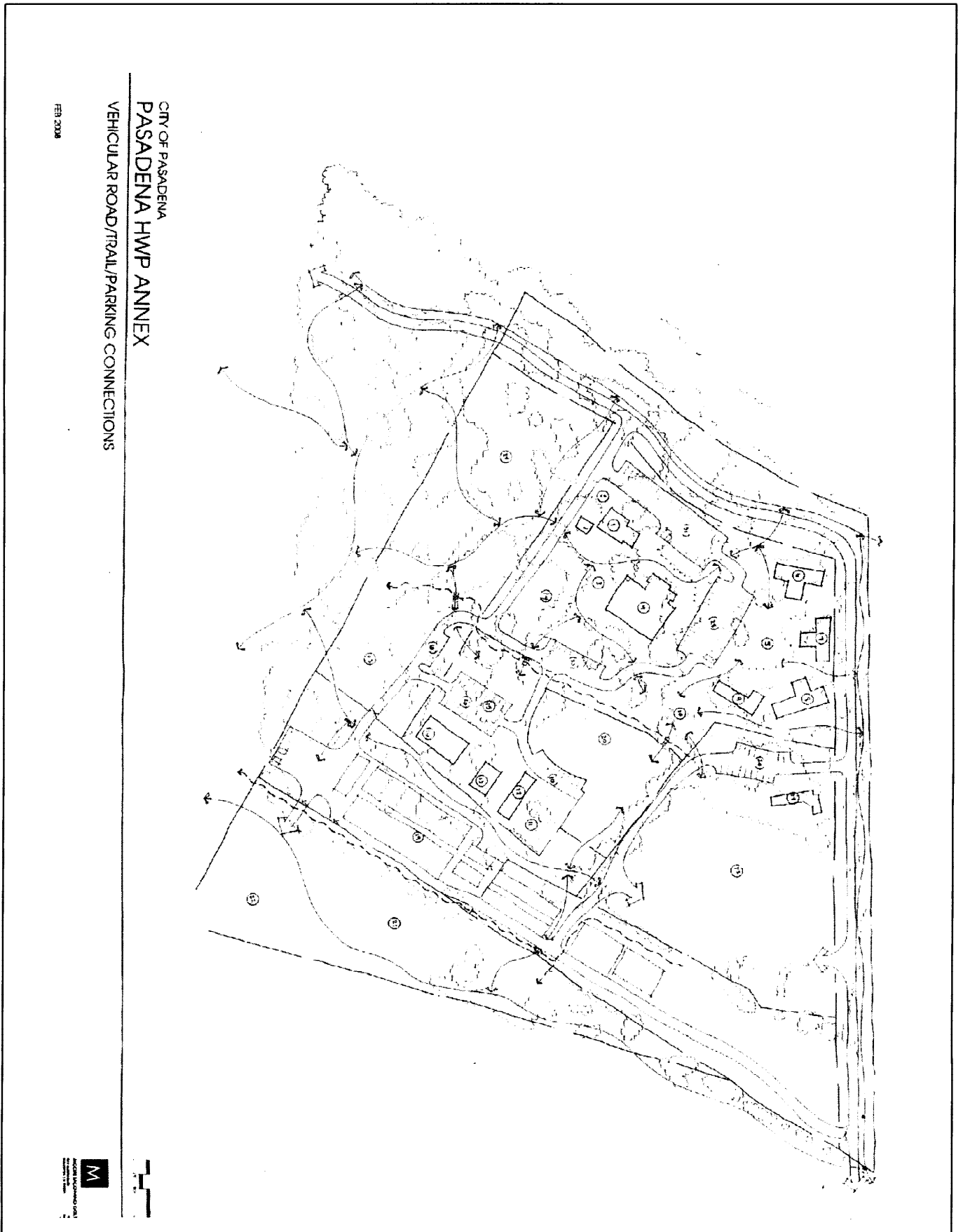


Figure F2 Shade canopy along the existing Annex trail

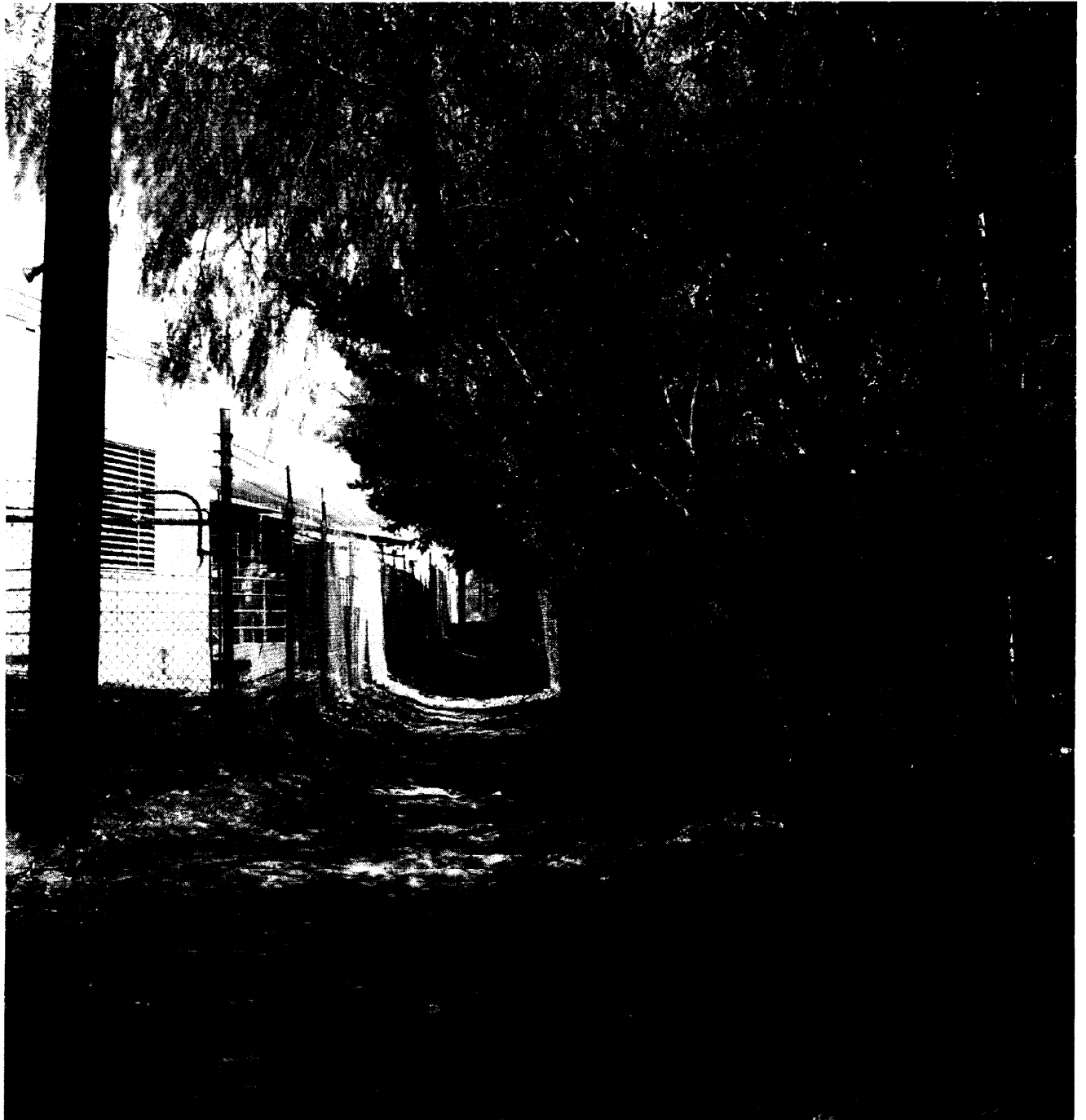


Figure F3 Non-natives in the Central Arroyo.



Figure F4 Northern oak on the JPL Connector Trail, Southern oak on the JPL Connector Trail



Figure F5 JPL bridge approach from existing trail - width
JPL bridge approach from existing trail - grade variance



Figure F6 EXISTING TRAIL CORRIDOR ON THE HAHAMONGNA ANNEX
Measurements taken every 20 feet from fence line to fence line

Trail entry 4 feet (there is a fence here that could be moved)

14' 5"

20'

19' 4"

20'

16' 3"

13' 11"

11' 9"

11'

10' 6"

10' 6"

10' 8"

11' 4"

11' 1"

10' 10"

11' 5"

11' 7"

11' 4"

10' 7"

9' 9"

8' 5"

7' 11"

7'

9' 6"

11'

14' 7"

22'

24' 10"

25' 6"

25' 8"

24'

23' 2"

23' 3"

22'

22" (46' to next measurement. Steep slope along the side not included in the measurements.)

17' 10" (from RBR fence to telephone pole) 100' distance to next measurement

22' End – telephone pole.

NOTE: These measurements are only of the existing trail corridor. There is also land available on the Rose Bowl Riders side of the fence which could be used for a future bikeway/trail. For example, in the vicinity of the jumping arena there is 15 feet available in the existing corridor plus an additional 13 feet on the RBR side for a total available width of 28 feet for the proposed bikeway/trail corridor. Even at the narrowest point behind the MACH 1 barn, there is still a total of over 12 feet available.

Star News 3-29-53

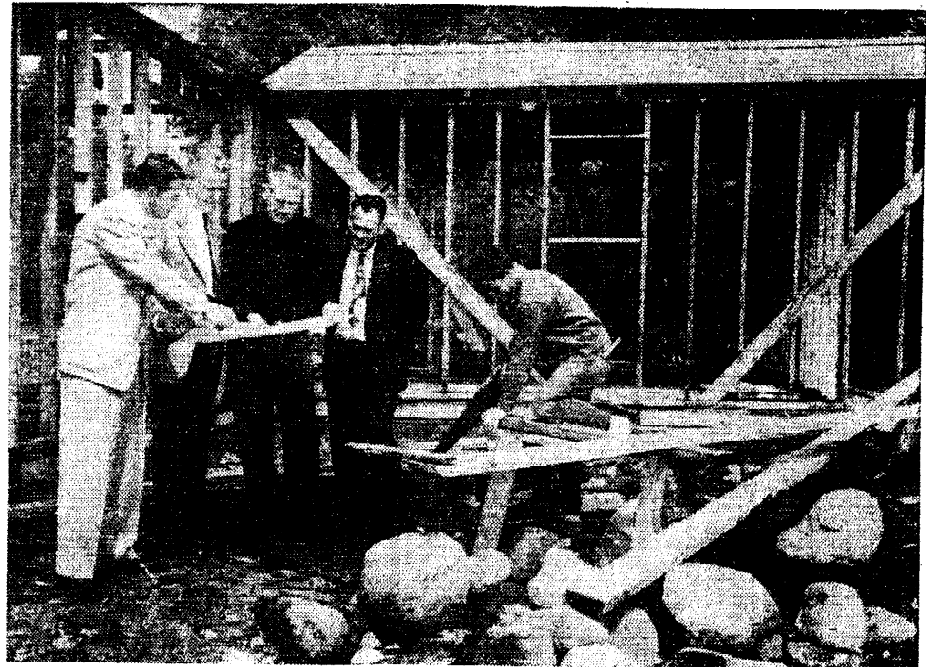
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(Continued)

Royce, co-ordinator; Affairs and Taxes, I. Mutchler, co-ordinator; al Affairs, Miss Abigail chlegell, chairman, Mrs. Prisk Paddock, co-ordina-

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LUATION, George B. s, chairman and co-ordi- Federal Affairs and Milton Katz, co-ordina- re Advisory, William F. t. Jr., chairman, Earl W. co-ordinator; For u m. s F. Prickett, chairman. Katz, co-ordinator. th and Hospital, Collis P. ay, co-ordinator; Hotel, idolph Richards, co-ordi- Industrial, Edward S. es, chairman, Abe J. Hay, nator; Membership, Wil- Carl, Sr., chairman and nator. ol Affairs and Taxes. nce T. Cooper, chairman, P. Holladay, co-ordinator; Affairs, J. Randolph ds, co-ordinator; State and Taxes, John W. s, co-ordinator; Tour, l Karl, Sr., co-ordinator; and Parking, Roger M. chairman, Earl W. co-ordinator.



APPROVE PROJECT—Superintendent of City Parks Henry B. Garwood, second from left, placed his stamp of approval of the club house and show ring being built by the Rose Bowl Riders, Inc., on Oak Grove Park property set aside for them by the city. Others left to right are Don Hoover, city engineering department; Edward H. Clive, chairman of the Civic Auditorium dance, May 1, and horse show May 2 and 3 to raise funds to finance the project; and Connie Gordan, department superintendent of parks. Spade Cooley will play for the dance.

victed Third e for Slaying

ACUSE. N.Y. (AP) The

Selected to Play in Conference Band

John B. Kleker, III, left Pasadena last night for Tucson, Ariz., to be with the All Conference...

Not All Science

CALTECH SOPHOMORES VERSATILE STUDENTS

Figure F8 FOH Trail Solutions 1 and 2 Combined as Approved by the Design Commission 9/15/09



Legend:

- Green = Existing Equestrian Trails**
- Pink = Park Road and Bikeway**
- Red = Staff Proposed Trails**
- Light Blue = Road To Parking**
- Yellow = Proposed Equestrian and Hiking Trails**
- Orange = Proposed Biking and Hiking Trail**

Figure F9 FOH Trail Solution 3 (Original Alternative) 9/13/09



Legend:

Proposed Equestrian / Hiking Connector Trail, Proposed Bikeway (Orange), Equestrian / Hiking Trail, FOH

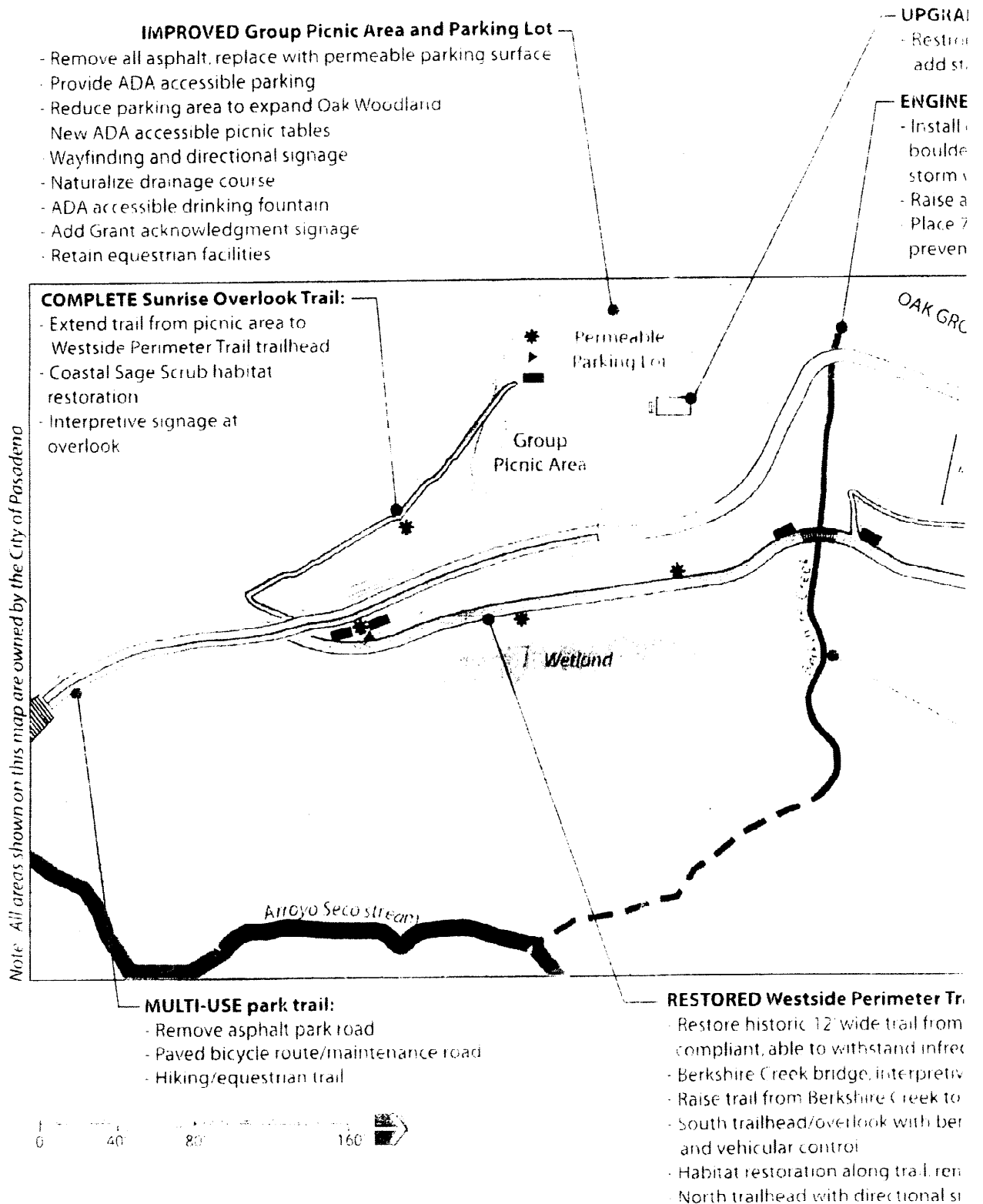
Figure F10 Existing Perimeter Trail/road – FOH’s Original Bikeway Alternative



Figure F11 Shared use trail at the south end of Hahamongna



Figure F12 Detail from Berkshire Creek Proposed Site Plan showing multi-use park trail/bikeway



Appendices A-1 to A-6

Appendix A-1: Project Matrix

General			
1	Apply for a Master CUP for entire Annex to facilitate implementation of projects	Y	First appeared in the July version.
2	Include JPL bridge for crossing to complete the loop (temporarily)	Y	Outside scope of annex but mentioned in the Nov plan. Inconsistent with JPL Comments DMEIR Vol 2 and HWP Master Plan.
3	Change to zoning PD-16 to OS	N	Recommended by FOH. November version suggests changing zoning would jeopardize JPL lease.
4	Remove all non-native trees from the Annex	Y	Impacts approximately 70 trees. Project introduced in the November version, after all Commission review except HWPAC.
Environmental Education Center			
5	Remodel and expand the main conference hall	Y	Includes minor re-grading.
6	Remodel the 3 environmental classrooms	Y	
7	Remodel the dining hall	Y	
8	Construct 2 new outdoor classrooms	Y	
9	Construct new demonstration garden area	Y	
10	Repair lab and greenhouse	Y	
11	Remodel park residence	Y	Includes minor re-grading
12	Repair various metal buildings, remove metal shed	Y	
13	Establish a Group Picnic Area	Y	
14	Establish an Environmental Vocation Center	Y	
15	Establish a Park Maintenance Facility	Y	
16	Establish a Nursery Co-Op	Y	
17	Establish a New Restroom	Y	
Equestrian Center -Public Riding Arena and Staging Areas			
18	Extensive rehabilitation or replacement of the clubhouse	Y	
19	Upgrade picnic area and install kiosk	Y	
20	Install large riding arena with grandstands	Y	Includes major re-grading. Language changed to "provide/reconfigure" in July version
21	Remove round pen	N	Language changed to "modify/repair/relocate" in July version
22	Replace/relocate existing oval arena (displaced by greenway)	Y	Includes major re-grading. Language changed to "modify/repair/relocate" in July version and "displaced by greenway" removed
23	Replace MACH I barn (displaced by greenway)	Y	Includes major re-grading. Language changed to "modify/repair/relocate" in July version and "displaced by greenway" removed
24	Relocate jumping arena (displaced by greenway)	N	Includes major re-grading. Language changed to "modify/repair/relocate" in July version and "displaced by greenway" removed
25	Install visiting corrals	N	Language changed to "formalize" in July version and removed in November version

#	Description	Impact	Notes
26	Install gates / security fencing	Y	Involves underground infrastructure removal. Has been inconsistent from plan to plan
27	Relocate/improve horse trailer parking	Y	Involves grading and paving and proposed location may not be suitable
28	Install new tie rails	Y	
29	Install water meter	Y	
30	BMP for watershed management	Y	
31	Relocate access to the equestrian center	Y	Introduced in the November plan and where it will be located is not identified, possible significant impact
32	Install new gates to control vehicle access to boarding area	N	Introduce in the June version and removed again in the November plan
Equestrian Center - Horse Boarding Area			
33	Reorganize horse boarding area	Y	Introduced in the June version. Potentially significant impacts and cost
34	Regrade horse boarding area - drainage	Y	Introduced in the June version. Potentially significant impacts and cost
35	Increase corral capacity (from 36 to 70)	Y	Introduced in the June version.
36	Install hay / feed storage	Y	Introduced in the June version. Potentially significant impacts and cost.
37	Rehab or replace tack storage barn	Y	Introduced in the June version. Potentially significant impacts and cost.
38	Install 28 parking spaces	Y	Introduced in the June version. Potentially significant impacts and cost.
39	Improve / realign access roads (north road)	Y	Introduced in the June version. Potentially significant impacts and cost.
40	Relocate jumping arena	N	Introduced in the June version but removed in the November version. Involves regrading and hard pan construction
41	Establish trailer parking area	Y	Introduced in the June version. Potentially significant impacts and cost.
42	Enhance native vegetation	N	
43	Secure area for safety of horses	Y	Plan does not identify how this will be done so impacts have not been evaluated.
44	BMP for watershed management	Y	Unknown impacts until a BMP expert evaluates
Equestrian Center - Youth Camp Area			
45	Install hay / feed storage	Y	Introduced in the June version
46	Install security fencing	Y	Introduced in the June version
47	Improve / realign access roads (south road)	Y	Introduced in the June version
48	Relocate wrangler's residence	Y	Introduced in the June version
49	Secure area for safety of horses	Y	
50	Reorganize horse boarding area	Y	Introduced in the July version
51	BMP for watershed management	Y	Unknown impacts until a BMP expert evaluates
52	Abandon septic system	Y	
Equestrian Center - Therapeutic Recreation Area (relocation)			
53	Grading / site preparation	Y	
54	Install new arena	Y	
55	Install office space with ADA restroom	Y	
56	Install wash rack	Y	

		Y/N	Comments
57	Install tack and equipment storage	Y	
58	Install hay / feed storage	Y	
59	Install stables for 8 horses	Y	
60	Install visitor and staff parking	Y	
61	Install spectator viewing area / picnic arena	Y	
62	Secure area for safety of horses	Y	
63	BMP for watershed management	Y	
64	Install access route	Y	
	Natural Open Space (within Annex)		
65	Restore oak woodlands (2 areas)	Y	
66	Restore eastern Portion as a Sycamore Grove	Y	
67	Upgrade shaded rest areas with picnic tables	Y	
68	Remove non-native trees	Y	Not in earlier versions of the Plan
	Recreation Greenway		
69	Construct 30' to 50' recreational greenway for bikes, pedestrians and equestrians.	N	Involves grading, relocating infrastructure. Reduced from 50 to 30 in June. November version reduces the bikeway to 10 feet but eliminates shared use with pedestrians
70	Remove non-native trees	Y	Originally removal of 7 - 19 trees in staff proposal. Now impacts 70 trees overall,
	Recreational Bikeway and (potentially) pedestrian/equestrian trail (Nov 09)		
71	Exclusive use for bicycles	Y	Introduced in the November version
72	Allow small motorize and emergency vehicles	Y	Introduced in the November version. Plan now allows for vehicular traffic not allowed in previous versions.
73	Construct retaining walls	Y	Introduced in the November version
74	Plant natural screen (barrier) on northern side	Y	Introduced in the November version
75	(Potential) equestrian / pedestrian trail	Y	Introduced in the November version. Listed as "has been considered" 4-8 foot width proposed
	Los Angeles County Fire camp 2		
76	Remove non-native trees	Y	Number of impacted trees within the LA CO Fire Camp 2
	Common Areas within Annex		
77	Restore native planting	Y	Annex area restoration not included in HWMP
	Site Drainage and Water Quality		
78	Re-grade horse boarding area	Y	Potential significant impact
79	Install natural storm water drainage	Y	Potential significant impact
80	Repair non-functioning storm drains (3)	Y	Potential significant impact
81	Provide individual water meters for tenants	Y	Potential significant impact
82	Provide individual electrical service for tenants	Y	Potential significant impact
83	Provide natural gas connections for clubhouse	Y	Potential significant impact
84	Eliminate septic systems (2)	Y	Potential significant impact
	Solid Waste		
85	Establish centrally located manure collection	Y	Where it will be located is not identified, unknown impact
	Mobility		
86	Construct roadway thru annex to JPL parking lot	N	Road thru MWD land first appeared in ASMP

			Comments
			8/2001 version. Was called inner park access road. Was not listed as a project in the MP Amendment but was mentioned in the IS. Removed in the July version.
87	Extend current road into enhanced parking area (equestrian area)	Y	Potentially significant impact
88	Install way-finding signage	Y	
89	Replace asphalt roads with permeable surfaces	Y	Potentially significant impact
90	Relocate and construct new roadway on horse boarding area	Y	Potentially significant impact
91	Create parking/dropoff area for buses	Y	
92	Eliminate impediments at the primary access to equestrian area	N	Unknown what this means. Impact unknown
	Bicycle Access		
93	Restore public trail connections btw EEC, Equestrian Center, JPL	Y	
94	Remove perimeter fencing	Y	
95	Install Bicycle Racks	Y	
	Parking		
96	Convert impermeable surfaces to permeable surfaces	N	Potentially significant impacts. Removed from the November plan
97	1200 space parking structure	N	Language removed from the July version of the IS.

Appendix A-2: Chatten-Brown & Carstens' June 5 Letter to Michael Beck

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June 5, 2009

Via Email

Michael Beck
City Manager
City of Pasadena
100 N. Garfield Ave., Room S228
Pasadena, CA 91109

Re: **Alternative Location for Bike Path in Hahamongna Annex**

Dear Mr. Beck,

Thank you for providing the Friends of the Hahamongna with the opportunity to propose an alternative to the 30 foot wide recreational trail greenway currently included in the June 2, 2009 Draft Hahamongna Watershed Master Plan Addendum for the Hahamongna Annex (Recreation Greenway Alternative) at our meeting yesterday afternoon. Friends of the Hahamongna's proposal includes:

- keeping the hiking/equestrian trail in its historic location on the Annex, but move the proposed bike path to an existing unimproved road on the south and east side of the Annex (referred to in the Hahamongna Watershed Park Master Plan as the Perimeter Trail/Roadway);
- eliminating the reconfiguration of the Annex Equestrian Center from the Master Plan Addendum;
- removing the "road to nowhere" on the east side of the Annex from Master Plan Addendum; and
- sending the revised Master Plan Addendum and the environmental review document for the Addendum back to the Hahamongna Watershed Park Advisory Committee prior to the City Council hearing on the Master Plan Addendum.

Under the alternative advanced by Friends of the Hahamongna, bicyclists would still be able to make a loop around the entire park. They would also be able to reach the Annex locations, such as the Nature Center and the Equestrian Center, via the existing park road.

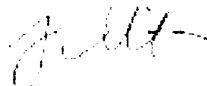
Michael Beck
June 5, 2009
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This alternative would also result in significant cost reductions because it would require less grading and would no longer require the reconstruction of several of the Equestrian Center facilities. The Recreational Greenway Alternative in the current Master Plan Addendum would require considerable grading since there are several changes in elevation in that area of the Annex. In contrast, the Perimeter Trail/Roadway is an existing flat unimproved road that would require minimal grading. The Recreational Greenway Alternative would also require the removal or relocation of the following Equestrian Center infrastructure: the barn where Mach 1 therapeutic riding program is housed; the oval arena; and the jumping arena. Arenas are expensive to redo because they require an underlying hard pan, specific surface materials, and very precise grading.

Friends of Habamongna's Alternative would also have environmental benefits. Since the Perimeter Trail/Roadway already exists, there is only one oak tree near the road that might be impacted. The Recreational Greenway Alternative would impact between 7 and 19 trees, including 12 oak trees. The Perimeter Trail/Roadway would also require much less grading, resulting in fewer air quality impacts.

Thank you for your time and for agreeing to consider the alternative we have proposed. Feel free to contact me if you have any questions.

Sincerely,



Amy Minter

cc: Pasadena Planning Commission

Appendix A-3: Chatten-Brown & Carstens' August 3 Letter

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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 230 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 30 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 Habamongna 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 Habamongna 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?

Theresa Fuentes
August 3, 2009
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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 Minster

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

Appendix A-4: Chronology

West Hahamongna Chronology of Development Proposals 1980s - present

For over 20 years the community has repeatedly expressed its desire to keep Hahamongna Watershed Park rustic and natural, “a haven... for all seeking peace.” For almost as long, there have been proposals to develop it extensively. In the recent planning for the Hahamongna Annex, a proposed road, taken out of the Hahamongna Master Plan after community protest, is once again under consideration. The Annex is the 30 acres in the park formerly owned by the Metropolitan Water District (MWD) and now owned by the City of Pasadena.

The following chronology outlines the developments proposed for the west side of Hahamongna from the late 1980s to the present in the words of actual documents. For those of you less familiar with the story, it may also be helpful to have a brief overview:

In the late 1980s, the area behind Devil’s Gate Dam lay desolate and neglected, a dusty quarry and illegal dumping ground. Even the lake which had pooled behind the dam was no more after the dam was declared seismically unsafe in the 1970s. This was the dry, barren expanse where a group of visionary local residents saw instead a restored wetland with lakes, trails, bird sanctuaries and picnic areas. And so began the Devil’s Gate Multi-use Advisory Committee in the 1980s and the long struggle to keep Devil’s Gate, later Hahamongna, natural.

Pasadena decided in the early 1990s to take out the east side Jet Propulsion Lab (JPL) parking lot and replace it with water spreading basins. A parking garage was to be built in the park to house the displaced cars, thus generating revenue from increased water percolation while still retaining the JPL parking revenues. One of the locations proposed for this garage as early as 1992 was the JPL West Arroyo parking lot, carved out of open space as a temporary parking lot in 1986. In the 2002 Hahamongna Watershed Park Master Plan, park user access to this garage was proposed via a new road to be built across the Annex property. According to city documents, as many as 600 cars were projected to pass through the park to access the garage on weekends. One consultant even suggested that revenue could be generated by using this parking garage for off-site parking for the Rose Bowl.

But to return to 1986 – it was actually two west Hahamongna open space parcels, including one on the Annex, which were rezoned so that the JPL West Arroyo parking lot could be created. These were referred to as Planned Development-16. Although the Annex parcel was never used for JPL parking, it still to this day retains the PD zoning. The strange result is that part of the Annex, protected in perpetuity by an open space easement, is zoned for a planned development!

In 2007, JPL received notification from Pasadena that in 2013 the spreading basin project would begin and JPL would have to vacate the east parking lot as of spring 2013. Where those 1200 cars would park in the future and how that would impact Hahamongna became questions of more than academic interest.

Over the years various developments have been proposed for the park in addition to the parking garage. In 1988, William H. Pickering, a former JPL Director, sent a letter to the City expressing interest in building a Hall of Science in Oak Grove Park. In 1991, a Devil’s Gate draft park plan map shows a general science museum located immediately to the east of the Annex property with a large parking lot just to the north. A year later, a Pasadena staff report mentions the south knoll near the Equestrian Staging Area as a possible location for a science museum. In 1993 Pasadena staff submitted to the City Council a proposal to bring the Southwest Museum to Hahamongna. This was an ambitious project which would have changed the nature of the park forever – an influx of 300,000 visitors was projected!

Five year later, in 1998, Pasadena approached MWD expressing interest in purchasing the Annex property where Los Angeles County Fire, the U.S. Forest Service, Rose Bowl Riders and Tom Sawyer Camps had been located for many years. At the time MWD was not ready to sell but proposed instead a low cost long-term lease. For over 5

years the lease negotiations dragged on without success. MWD wanted to retain the existing tenants while Pasadena wanted a lease which would give them the ability to substitute users and increase the intensity of land uses on the property in the future. Foothill Municipal Water District also wanted to retain part of the property for a water storage tank which further complicated the lease negotiations.

In 2005 MWD's Board of Directors reversed course. They decided that the property was no longer needed for any water purpose and could be sold. Pasadena then purchased the property and began the Annex planning process which has resulted in the reappearance of the road to the west JPL parking lot, a critical component of earlier revenue generating proposals planned for Hahamongna.

Pasadena was not the only entity still interested in developing the Annex, however. In 2001, JPL met with MWD staff and set forth a plan for a science museum and a parking garage on what is now the Annex property. The JPL Master Plan, released in 2003, identified the Annex property as having acquisition potential for Laboratory expansion. There was interest from the private sector as well. In 2003, when word got out that the Forest Service was not interested in renewing their lease, a real estate broker contacted MWD about putting an office park on the Annex. About the same time, another broker offered his services to find what he considered a suitable tenant for the property such as a private school campus.

Throughout the years, despite this enormous development pressure, the community remained steadfast in its commitment to a natural, rustic Hahamongna, attending dozens, if not hundreds, of meetings over the years. The equestrian community was particularly active, concerned that the plan was eventually to move Rose Bowl Riders, Tom Sawyer Camps and MACH 1 off the Annex and out of the Arroyo in favor of higher intensity uses which would generate more revenue.

The community was so concerned about Hahamongna and the rest of the Arroyo that, in 2003, over 600 comments were sent in concerning the Arroyo Seco Master Environmental Impact Report. In response to those comments, the parking garage and the road through the Annex were removed from the Hahamongna Watershed Park Master Plan. The road, however, is once again being proposed, prompting Hahamongna watchers to wonder whether the parking garage will also reappear at a later date, thus segmenting the environmental impacts of this long considered project. Once the road is built through the Annex, extensive development on the west side of Hahamongna will be difficult to stop.

The document excerpts that follow are arranged by topic in chronological order. Where some explanation of the quotes seemed helpful, the comments enclosed in parentheses are mine as is the underlining.

PARKING GARAGE AND ACCESS ROAD

<p>May, 1992</p>	<p>Devil's Gate Multi-use Project Preliminary Economic/Feasibility Analysis</p> <p>This Analysis states that "the parking lot used by JPL on the east side of the Devil's Gate eventually will be used for habitat restoration, spreading grounds..." p2-33</p> <p>"To accommodate a change in parking location could require construction of a parking structure. A 2,000 car facility would require a 400,000 square foot facility, and a four story structure would occupy a 2.5 acre site"... [The parking structure would] "provide parking space that can be used by workers at JPL during business hours and by visitors to the recreation areas at other times." p2-35</p>
<p>July 25, 1992</p>	<p>Map prepared by Takata Associates...</p> <p>This map shows the existing West Arroyo parking lot to be used for shared parking between JPL and the park (on weekends). (Interestingly enough, in 1992, this was still a "temporary" parking lot so it is unclear why it was being considered as a possible location for the parking garage at this point.)</p>
<p>December 7, 1998</p>	<p>Fact Sheet - 29.5 Acre property owned by Metropolitan Water District [now the Annex], prepared by Pasadena Parks and Natural Resources</p> <p>This document states that the MWD/Annex property is of interest for the "extension of the Oak Grove Road to JPL south east corner then north to JPL Bridge."</p>
<p>1999</p>	<p>Draft Hahamongna Watershed Park Master Plan</p> <p>"JPL parking improvements are proposed in two phases. The first phase will retain the west side parking lot and reduce the east parking lot by 25% to 849 spaces... The second phase of the JPL parking improvements will construct a 1,200-space parking structure on the existing west parking lot site to accommodate JPL's parking, see Exhibit 3-4, Spreading Basins & Northeast Parking Plan..." The JPL parking is recommended to be shared use parking..." p3-36</p>
<p>December 1999</p>	<p>Hahamongna Watershed Park Master Plan – Implementation of the Master Plan – Technical Report prepared by The Natelson Company, Inc.</p> <p>A 1200 space parking structure is planned on the west side of the park. "In addition to the income from the JPL lease, it has been assumed that the structure parking facility could be utilized by recreational users on weekends... Assuming a weekend occupancy factor of 50 percent, the parking structure could potentially generate approximately \$125,000..." p7 (600 cars per day through the oak woodlands and the Annex!)</p>
<p>February 1, 2001</p>	<p>Assessment of Travel Demand Management Strategies for the Central Arroyo Master Plan, Linscott Law & Greenspan, Engineers , Appendix G to Appendix F, Traffic Impact Study Arroyo Seco Master Plan, Arroyo Seco Master Environmental Impact Report, Volume II Hahamongna Off-Site Parking</p> <p>"Parking facilities identified in the Hahamongna Master Plan would be available for use by</p>

	<p>employees and/or patrons [of the Rose Bowl].” p2</p> <p>“The Hahamongna Master Plan indicates the availability of parking facilities as part of arrangements with the Jet Propulsion Laboratory (JPL) and/or as part of the development of a “West Arroyo” parking structure adjacent to the Arroyo. A shuttle service originating at JPL and/or the “West Arroyo” parking facility would reduce the demand for event related parking and vehicular travel in the Central Arroyo.</p> <p>The preferred use for an off-site parking area in the Hahamongna Master Plan area would be to accommodate the parking needs of Rose Bowl event employees. Employee parking for larger Rose Bowl events could include the use of 300 to 600 spaces depending on the size and type of event...” p9</p> <p>(Note: This was a consultant’s recommendation which, although being a part of the official documentation, was not released during the environmental review process for the Arroyo Seco, despite numerous requests from the public for information about the proposed use of Hahamongna for Rose Bowl parking.)</p>
2002	<p>Draft Hahamongna Watershed Park Master Plan</p> <p>“A new [1200 space] JPL parking structure on the west side is proposed as a shared-use facility. On weekends and holidays, when the parking is not used by JPL, the parking spaces will be available to the park visitor via the inner park access road through the Metropolitan Water District (MWD) property.” p 3-46</p>
2003	<p>Response to Comments Matrix, Arroyo Seco Master Plan Project, Volume III, Arroyo Seco Master Environmental Impact Report.</p> <p>The response by Pasadena staff to comment letters about the JPL Parking Structure in Hahamongna Watershed Park is that “based on staff review of the public comments received to date, a Staff Recommended Alternative has been formulated... This alternative recommends removing the 1,200 space parking structure from its currently proposed Westside location.” p13-99. The Staff Recommended Alternative also “removes the West Arroyo Inner Park Access element from the project description. This alternative does not include the construction of the road bisecting the MWD property.” p13-118.</p> <p>The Redline Version of the HWP Master Plan shows the JPL parking garage deleted (p3-71) as well as the West Arroyo Inner Park Access road across the MWD property deleted, p3-73. Neither parking garage nor road is included in the HWP Master Plan as adopted.</p>
March 2008	<p>Overview: Proposed Access, Circulation & Parking, Hahamongna Watershed Park Annex</p> <p>Although the road across the Annex was deleted from the HWP Master Plan, this road reappears several years later during the planning for the Annex property. The Annex Proposed Access, Circulation & Parking Options A, B and C would all allow a road to the JPL West Arroyo parking lot, either now or in the future.</p> <p>Option A proposes a separate bicycle green way and pedestrian/equestrian trail, making “a 25-foot access corridor” along the northern edge of the Annex to the JPL bridge, a corridor wide enough to build a road in the future.</p>

	<p>Option B proposes a road extending from the Oak Grove Field along the Perimeter Trail. This is the existing dirt road sometimes referred to as the Old Quarry Road.</p> <p>Option C reinstates the road bisecting the Annex property which was removed from the HWP Master Plan. <u>(The road would be part of a 50-foot wide access corridor that would also include the bicycle greenway and restored pedestrian/equestrian trail. Foothill Boulevard where it intersects with Oak Grove Drive is 50 feet wide!)</u></p> <p>None of these three options was included in the HWP Master Plan as adopted.</p>
January 2009	<p>JPL Amended and Restated Real Property Lease, effective January 1, 2009</p> <p>The most recent version of the lease between the City of Pasadena and JPL makes significant changes concerning the JPL West Arroyo parking lot. Although the lease makes no mention of how cars are to get there, the lease states that the landlord (the City) shall have the right to use the parking lots on weekends and holidays “for the purpose of providing parking for park and recreation and other City related and sponsored purposes offered by landlord to the general public... these uses shall be considered ‘governmental activities’ for the purpose of this Lease” Article 4(b)(3). The only way the public could access this parking lot would be on a new road cut through Hahamongna.</p> <p>This language also suggests that the parking lot may be used for something other than parks and recreation parking which could be a major increase in use. Kelly Kitasato, Pasadena Real Property Manager, stated at the City Council meeting, January 12, 2009 that “the City would have the opportunity when needed to use the west... parking lot... for some type of overflow for city functions at the park or at the Rose Bowl.”</p> <p>There is further evidence within the lease language that the City is planning to retain this parking lot indefinitely even though, according to the terms of PD-16, it was to be returned to open space uses if JPL were no longer using it for parking. The lease states that, upon the expiration of the lease, JPL is to ‘remove all structures and other improvements’ and to ‘restore the Property to its natural condition. Such work shall not include the paving on the Lower Road or <u>paving and fencing on the West Arroyo...</u>’ The lease contradicts the terms of PD-16 which states that “JPL shall restore and/or landscape the subject properties at the termination of the parking lease.”</p> <p>The City has since agreed to remove the objectionable language from the lease. While commendable, this amendment of the lease only runs through June 30, 2012. It will be the next lease which will be critical because JPL must move out of the 1200 space east Arroyo parking lot by the summer of 2013 so that construction can begin on the new spreading basins.</p> <p>In the next several years we will see whether or not these long-standing plans for a parking garage on the west Arroyo parking lot and a road through the Annex are once again resurrected despite the unwavering community opposition.</p>
November 20, 2009	<p>Hahamongna Watershed Park Master Plan Addendum for the Hahamongna Annex, Final Draft</p> <p>Although the environmental review of the road has been taken out of the Initial Study, the plan has been changed so that the major impediment to the road will be eliminated. Hence,</p>

	<p>when the time comes for the environmental review of the road in the future, there will not be much to stop it.</p> <p>The main impediment is trees in the corridor: <u>SEVENTY non-native trees in total are now proposed for removal on the Annex</u> in the current Plan including THIRTY-THREE in the corridor (19 in the trail/bikeway alignment as proposed by staff and 14 additional in the road corridor)</p> <p>When the Commissions were reviewing the Annex documents, the Initial Study said this about the trees: <u>“it is the city’s intent to align the trails in a manner that preserves as many existing trees as reasonably possible... city estimates that the number of trees that would be impacted... in range of 7 -19 trees.”</u> Initial Study, Rev. 1, p. 3-19</p> <p>Now the Initial Study states the following “the proposed Master Plan Addendum recommends removing all trees that are not native to California from the Annex site...” p.2-23</p> <p>The Plan also calls for the removal of a barn out of the corridor and shows “habitat restoration” where two arenas are now located in the corridor. To make matters even more confusing, it appears that the bikeway/trail alignment recommended by staff is still under consideration. This is 40 feet at its widest location and is the alignment that was rejected by all the City’s advisory groups which reviewed the Plan.</p>
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Mary E. Barrie

Friends of Hahamongna

Appendix A-5: Mary Barrie's Comments to HWP Annex Draft Planning Framework

5159 Crown Ave.
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June 30, 2006

Ms. Rosa Lavcaga
Arroyo Seco Project Supervisor
P.O. Box 7115, Room 255
Pasadena, CA 91109

Dear Rosa:

The following are my comments on the Hahamongna Watershed Park Annex Draft Planning Framework vision statement and goals and objectives as well as some comments on the design charette results. Thank you for the opportunity to provide more input concerning this very significant planning process.

Draft Planning Framework Comments

As I mentioned in a previous e-mail, although I support the vision of the native plant nursery and the nature center, the Annex vision statement is disappointing in that it does not capture any sense of the equestrian vision for the property. As a result of following the goal framework of the Hahamongna Watershed Park Master Plan, equestrian input from the Annex planning meetings is only minimally reflected in the goals and objectives.

At the first community meeting held April 6, your staff grouped similar responses together. Out of 57 responses concerning equestrian use of the property, 53 said preserve and/or expand equestrian uses of the Annex. The vision of these community members is that equestrian uses should continue in Hahamongna long into the future, for their children's grandchildren and beyond. Unfortunately there is no sense of this in these important planning documents.

The vision statement is deficient in its lack of specificity. It refers generically to "an equestrian facility" which could mean anything from a small ring with no horses on the property to something as grand as the Burbank Equestrian Center. Language such as "an equestrian facility" does not necessarily protect Rose Bowl Riders, Tom Sawyer Camps, and MACH 1.

The goals and objectives section also only briefly mentions the equestrian use of the property. Out of 7 goals and 42 objectives, there is only one objective that even mentions the historic equestrian uses of the property. As noted above, an overwhelming number of those commenting at the meeting April 6 stated as a major goal that Rose Bowl Riders, Tom Sawyer Camps, and MACH 1 should remain on the property.

In a previous correspondence, you stated that the goals and objectives were not the place to mention specific entities. Most of the community members who turned out at

the planning meetings, however, did have a very specific goal of keeping Rose Bowl Riders, Tom Sawyer Camps, and MACH 1 on the property. This was repeated over and over. It seems appropriate to include a specific and much more detailed goal that accurately reflects their input, such as the following: "Keep horses on the property, such as the current uses which are Rose Bowl Riders, Tom Sawyer Camps, and MACH 1, so that future generations can continue to enjoy equestrian recreation in the Arroyo Seco."

An objective under this goal would be the drafting of a long-term lease between Pasadena and the equestrian groups, which is crucial if the horses are to remain. The lease was also brought up over and over again at the planning meetings as an objective desired by the community.

An interesting goal also mentioned repeatedly at the meetings was to maintain and enhance the rich diversity of recreational activities in the community. There was a recognition by the public that "one size does NOT fit all" when it comes to children's recreation and that the opportunities afforded by Rose Bowl Riders, Tom Sawyer Camps, and MACH 1 were unique and of great benefit. Goal 4 would better reflect the community input if it were amended to read as follows:

"Maintain and enhance current recreational uses within the Annex, including equestrian uses such as Rose Bowl Riders, Tom Sawyer Camps, and MACH 1..."

The wording of Goal 4 states that the goal is to "provide diverse recreation opportunities for the Pasadena community." The equestrian programs on the Annex serve a regional population, however. Rose Bowl Riders, for example, has a membership drawn from 51 different Southern California towns, the top five of which are Pasadena (22%), Altadena (17%), La Canada (16%), Los Angeles (8%), and South Pasadena (7%). In the interest of recognizing that the Annex property serves regional recreational needs, a more appropriate wording might be "Pasadena and surrounding communities."

One additional comment I had about the Draft Planning Framework concerns this paragraph: "Another key issue that is not reflected in or resolved through the draft planning framework is the potential conflicts between the proposed uses approved in the HWP Master Plan and the proposed vision and uses of the HWP Annex site. These potential conflicts will need to be further explored and resolved, which may result in additional revisions to the draft planning framework for the HWP Annex."

I have heard no discussion about this at any of the planning meetings. Is this intended to suggest that the equestrian uses of the Annex property will somehow be incompatible with the restored Hahamongna Watershed Park? The public should be informed what "potential conflicts" the city staff is anticipating, so that the "additional revisions to the draft planning framework" can be made during the public input process.

Design Charette Proposals Comments

The following are some general comments on planning for the Annex property as well as some specific comments about individual design scenario proposals.

The charette process was quite fascinating. There were many thought-provoking ideas generated. It was great to be able to ignore all constraints, budgetary and otherwise. That is what gives me pause now, however, when I look over the results. If some of the more grandiose proposals are adopted, where will the money come from for maintenance? How does building a large new nature center with all its noise and activity fit into the community's stated desire to keep the property rustic with low-impact uses? Wouldn't razing the Forest Service buildings contradict Pasadena's goal of reusing the Forest Service campus, a goal stated by city staff when the property was purchased from the Metropolitan Water District.

As several charette participants suggested, the key may be phasing. Rather than allowing the Forest Service campus to deteriorate further, restore it and let the public use it in the interim even if the decision is ultimately to build a new interpretive center. I seem to recall LA County Fire offering their services to help with asbestos abatement.

Any proposals to relocate the equestrian facilities should not be adopted without careful, in-depth study. Some factors to consider include:

- does the new area(s) include oak trees which could not be removed for arenas and stalls.
- is there infrastructure which must be removed? Who will cover this cost?
- how much of the equestrian acreage must be set aside for BMPs
- is some of the area (such as the steep slope on the property) unusable, thus necessitating a larger footprint?
- relocating arenas is costly. Resurfacing alone cost \$8000. Building a new arena could cost \$25,000 - \$30,000.

Rose Bowl Riders has been able to keep horse facilities available to the less affluent by operating on a shoestring budget. Where would the funds come from for huge relocation costs?

The community input process is intended to assist city staff with the development of a preferred alternative for the Annex property. One of the desired outcomes of the June 20 meeting was to "generate feedback about the charette results to guide the development of a preferred alternative." Unfortunately, however, the printed overview of the charette results was not available to those attending the meeting because of a mix-up at the printer. Thus, no one at the meeting except for a few charette participants, had seen the scenarios that were developed, so they were not in a position to state their preference. Will be the community be given this opportunity at the next public meeting?

The following are a few specific comments concerning the various design scenarios generated at the charette:

Group 1

1. The public path through the equestrian area poses liability risks and insurance problems. It seems unnecessary since the public could walk through the Enchanted Forest to access the park proper.
2. The location for the MACH 1 ring is problematic. A road through the Annex property to the parking lot next to JPL has been discussed by Pasadena staff as recently as the last few months. It also appeared in earlier versions of the Hahamongna Watershed Park Master Plan. A waste disposal site was also proposed in an earlier version of the Master Plan very near where the MACH 1 arena is located in this scenario. If there is any possibility these plans will be resurrected, this would be the very worst location for the MACH 1 arena.
3. There is probably not enough room for a jumping arena as proposed.
4. This scenario doesn't allow for extra parking for events, which are sometimes large. The natural horsemanship clinics, for example, can have 20 -25 participants and dozens of spectators who pay to watch.
5. Opening the Enchanted Forest to the public is a good idea as long as equestrian uses are also permitted. The shade is especially important for the children riding with Tom Sawyer Camps and MACH 1.
6. Adaptive reuse of existing buildings makes sense, especially in the short-term. After the basic remodeling is done, a volunteer day to paint, plant, and clean up could work wonders for free!

Group 2

1. The wildflower meadow is a lovely idea.
2. This plan appears to make major changes to the historic trail, which has been in its present location since before Metropolitan Water District bought the property in 1970. It would be prudent to investigate the history of this trail before any attempt is made to move it.
3. French drains around the arena seem rather excessive. The small amount of manure deposited in the arenas is picked up on a daily basis.
4. Where are the stalls in this plan?
5. Consolidating all the rings into one is not practical. As anyone knows who has moved jumps, there is a reason why most facilities have a separate jumping arena! Also, with at least two arenas, two separate events can be going on simultaneously.
6. This scenario doesn't take special events parking needs into account either.
7. The Group 2 summary says remove oak woodland from leased area. In the afternoon session, the group explained that in their plan equestrian use of the area would still be permitted. Unfortunately this is not reflected in the Charette Workshop Notes.

Group 3

1. As a member of this charette panel, my understanding was that all the existing Forest Service buildings were to be removed – not all buildings. I do not recall discussing a proposal to eliminate the Rose Bowl Riders clubhouse or the structures in the equestrian area. This is an instance where the summary is misleading. Nor do I recall any discussion by our group of converting to 12x12 stalls – which also appears in the summary.
2. Is the completed bike loop to be dirt or hard surface? (The approaches to the new Flint Wash Bridge have a 12-foot wide bike path of asphalt concrete.) Like many of the charette workshop notes, the lack of specificity may unfortunately allow for many different interpretations in the future.
3. Several of the charette participants in this group suggested relocating the entrance to provide a more direct entrance to the Annex property. This would also provide a more direct entrance to the east parking lot should a road be built on the Annex property as has been proposed several times in the past. Relocating the historic trail would also get it out of the way of a new road.
4. The name “Watershed Center at Hahamongna” does not reflect and acknowledge the historic equestrian use of the property. A more appropriate and inclusive name might be “Hahamongna Watershed and Equestrian Center.”
5. The shared parking suggested by Group 3 is an excellent idea. It reduces the total amount of parking needed while still allowing extra parking for equestrian events when needed.
6. Placing the rings or one of the rings below the interpretive center is an interesting idea. It would provide a very unique visual experience for the visitor with the beautiful animals in the foreground and the mountain vistas in the distance.
7. Siting of the stalls needs to be carefully considered in terms of their proximity to the interpretive center. In this regard, the 3B and 3C plans probably work better, although 3A might work if the various elements were moved around so that the stalls were further away, perhaps moved to the lower area.
8. A 10,000 square foot nature center is very large. How would this conform to the community’s preference for keeping the site low-key and rustic? In addition, Pasadena staff stated publicly before buying the property that the Forest Service buildings were going to be kept and reused.

Pasadena has an incredible opportunity with the Annex planning process to live up to its reputation as a city that prides itself on its rich history and its outstanding quality of life. In the Annex planning process, the city has the opportunity to create a state-of-the-art equestrian facility, worthy of the city, which hosts the Rose Parade, world famous for its spectacular floats and magnificent horses.

Sincerely,

Mary E. Barric

(DRAFT) SUMMARY OF CARRYING CAPACITY ANALYSIS

Proposed road, driveway and existing trail (Area C2)	Proposed road, driveway and existing trail	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	See Above	See Above
Existing trail (Area C3)	Existing trail	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1) Remain the same	1) Remain the same
PFL easement area (Area C4)	PFL easement area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1) PFL use not permitted for residential use only	1) PFL use not permitted for residential use only

Legend
 Recommended carrying capacity

Notes and Definitions

"Intensity of Use" for Outdoor Spaces: Number of people in an outdoor space, as times that a percentage (%) of the space will be occupied by human use.
 (See Planning Standards by Kern County)
 Low Intensity Use = 1-2 people/100 SF = 3-50 SF per person
 Medium Intensity Use = 3-6 people/100 SF = 33 SF to 14 SF per person
 High Intensity Use = 7+ people/100 SF = < 13 SF per person

"Intensity of Use" for Buildings = Level of Occupancy
 Concentrated Use: Assembly, seating or standing room
 Unconcentrated Use: 1a to seating
 Dispersible Standards:
 Concentrated (standing) = 7 SF per person
 Concentrated (assembly/seating) = 12 SF per person
 Unconcentrated (table seating) = 20 SF per person

Minimum parking requirement for the City of Pasadena
 Commercial Recreation:
 Outdoor Parks and Recreation Facilities = 2.5 spaces/1000SF
 Recreation, Education & Public Assembly User:
 Camp, Lodges, Private Meeting Halls = 10 spaces/1000 SF

Destination Site: an outdoor space that the public will intentionally visit and drop in to use; a reservation will not be required to utilize the space. Parking Ratio = 2.5:1 unless otherwise noted

Non-Destination Site: an outdoor space that will be used in conjunction with an indoor space and/or will require a reservation to utilize the space. Parking requirements for this kind of space have been adjusted. Parking = 2.5/1000SF. % of area to be occupied by people, unless otherwise noted