

2020 July 31

Comment on Arroyo Seco Canyon Project draft EIR, dated 2020 June 15
from: C. Darren Dowell, resident of Pasadena, CA

Thank you for providing the opportunity to comment into the public record on the proposed Arroyo Seco Canyon Project. I am a Pasadena resident, scientist, and frequent visitor to Hahamongna Watershed Park where I study the bird populations, other wildlife, and plants. I have reviewed the draft EIR, dated 2020 June 15, and wish to record the comments below.

Although there are some positive elements of the project, I am overall disappointed to see that the City of Pasadena is considering a step backwards in its responsibility to be a leader on environmental issues and is instead planning a last-century approach to water conservation (actively-managed diversion and spreading) based on water policy from 1944 - 1974. The EIR does not address the overall environmental impact of that approach.

Instead, the City should strongly consider an alternative using the Hahamongna basin for more natural methods of water flow spreading and percolation into the aquifer, combined with a greater focus on water conservation in the operation of the Devil's Gate Dam. This appears to be the best solution considering water conservation, recreation, impact on habitat and wildlife, air quality, and greenhouse gas emission.

I find the following deficiencies in the draft EIR:

- 1) The EIR does not consider the cumulative impact of expanded spreading basins with respect to the L.A. Co. sediment removal and habitat restoration projects. City of Pasadena practice in managing spreading basins (such as annual vegetation removal) has demonstrated that they are "farms" for abundant invasive, seed-producing, non-native plant species. Their seeds are able to propagate to nearby habitat restoration areas which are mitigation for the sediment removal project, potentially reducing their habitat quality compared to the credit claimed by the County.
- 2) The EIR does not consider the cumulative impact of increased water diversion into spreading basins with respect to the modified structure of the Hahamongna basin as a result of the L.A. Co. sediment removal project. The latter project is in the process of lowering the elevation of the central part of the basin, which will tend to reduce the fraction of Arroyo Seco flow reaching the surrounding habitat. Neither that project nor the Canyon Project considered the combined impact of that effect and increased diversion from the Arroyo Seco. One could expect that the annual water flow in the Hahamongna riparian zone will end earlier in the spring as a result.
- 3) The EIR does not consider the (positive) cumulative impact for the

alternative of restoring natural flow of the Arroyo Seco with respect to the change in dam operation policy that will occur at the end of the one-time phase of the LACo sediment removal project in 2022-2023. As dictated in the Streambed Alteration Agreement for that project, and reinforced in the July 2020 settlement agreement between LACo and ASF/PAS, water will be retained behind the dam for a longer period at the end of the rainy season, with a goal of holding some water through July 1. This change in policy allows for a longer period of water absorption into the aquifer for water flowing unimpeded into the Hahamongna basin, but this was not noted in the EIR.

4) The EIR does not acknowledge or address the ongoing lease for JPL employee parking in the East Lot. Instead, the lot is called the "former JPL East Parking Lot".

5) The EIR does not address impacts from executing a project amidst an epidemic, unfortunately a new reality for the time being.

6) The impacts on recreation from trail closure is not mitigated to "less than significant" by the mitigation measures. Posting a trail closure sign is not mitigation; it's simply information. The impact on recreation should be noted as an unavoidable significant impact from the project.

7) MM-BIO-2 should be revised to make the provision to conduct the work outside bird nesting season mandatory. Nest surveys during nesting season is only a partial mitigation. An independent assessment should be obtained for the fraction of nests of the more secretive bird species that are detected in surveys prior to their encroachment by a similar project; I would be surprised if the fraction is as high as 50%, based on study of biological monitoring reports from other nearby projects.

8) The EIR should note the recent (May-July 2020) presence of a nesting Least Bell's Vireo pair within 1 km of the project area and family group within 700 m of the project area.

9) The presence of nesting Yellow Warbler, California species of concern, within the project area should be included in the executive summary.

10) The apparent inefficiency of the biological surveys in detecting coastal whiptail is concerning. (It was noted as "observed during the 2013 surveys", but not in the later surveys.) This is a common, regularly-seen (more often than not) species in project area 3.

Thank you for your attention to these comments and noted deficiencies.

Sincerely,

Dr. C. Darren Dowell
Pasadena, CA