

Attn: Elisa Ventura, P.E., Pasadena Water and Power

July 23rd, 2020

I am writing to address the Draft Environmental Impact Report for the Arroyo Seco Canyon Project (ASCP). I was employed by the Arroyo Seco Foundation back in 2010-2011 to work on the public outreach regarding this project. I am no longer employed in any capacity related to the project. This comment is strictly from my perspective as a concerned citizen.

The diversion and spreading basin component of this ASCP will significantly impact the habitat from the Devil's Gate Dam to upstream of the diversion structure. The goal of this project is to increase utilization of the City's surface water rights and maximize the beneficial use of this local resource.

The natural resources of the Arroyo Seco are connected in a complex manner supporting riverine and riparian habitat. I encourage the City to act as good stewards of these natural resources. I believe it to be good stewardship to allow the surface water flow (when available) to remain in the natural channel up to at least until surface flow reaches the Devil's Gate Dam reservoir. The City should divert only an amount of flow that will not prevent the surface water flow in the Arroyo Seco from reaching the dam reservoir. The reason for this is because any flow below this will percolate into the aquifer as well as support the riverine and riparian habitat along the channel.

The alternative referred to as 'Reduced Diversion with In-Stream Spreading' was rejected because it is stated that the City will not receive credit from the Raymond Basin Management Board (RBMB) for the water that infiltrates into the ground from the river bed. This is even though the DEIR acknowledges that a credible scientific report by Phillip Williams and Associates from 2000 suggests that **restoring natural flows to the park would increase groundwater recharge.**

The DIER should include a detailed response, and clear direction, from the RBMB regarding this specific alternative to the spreading basins, and the potential for receiving credit for 'in-stream spreading' before rejecting the alternative. It is not enough to claim that the infiltrating water from the river will not count as credit from the RBMB when the health of the river and habitat is at stake. This is precisely the objective of our environmental laws, to ensure projects like these do not unnecessarily degrade the environment, and our natural resources, when it can easily be avoided through mitigation.

The DEIR lays out some other reasons why this was rejected:

- 1) This scenario would require a re-negotiation of the adjudicated agreement
- 2) PWA does not address the practical matter of implementing the recommendations for water supply
- 3) would require measurement of the stream's percolation capacity
- 4) would require a new gauging station location, or another estimate for flows.
- 5) does not account for other sources of water
- 6) there is no feasible way to control the diversion and limit the flows so that the aggregate recharge does not exceed 25 cfs
- 7) LACFCD is already thinking of how best to conserve water and their answer is through spreading

From my perspective as a professional engineer specializing in hydrology, I believe these all can be addressed for much cheaper than the cost to build and maintain the diversion structure and spreading basins. If that is not the case, then please provide supporting evidence that addressing these issues will be more expensive and/or less effective. In other words, the DEIR should thoroughly evaluate the 'Reduced Diversion with In-Stream Spreading' alternative.

Thank you,
Jonathan Frame, P.E.