



PASADENA  
AUDUBON  
SOCIETY

July 31, 2020

To Ms. Elise Ventura

RE: The Arroyo Seco Canyon Project (ASCP)

The Pasadena Audubon Society (PAS) is grateful for the opportunity to comment on this plan; we also wish there were more opportunities for our members to familiarize themselves with its details, and we request at least one more public hearing on this project.

PAS appreciates the efforts by the Pasadena Water and Power Department (PWP) to increase the amount of water it diverts from the Arroyo Seco stream for municipal purposes. At the same time, we think the efforts rely on backward thinking and ask that the City use a more environmentally sensitive and effective plan.

Our primary concern is that the EIR treats the Arroyo stream like a source for water only with minimal concern for the habitat quality for birds or fish. It all but ignores the precious nature of riparian habitat in Pasadena or the unique location and qualities of Hahamongna. Hahamongna contains five unique habitat zones and is home to several endangered and threatened species.

We are concerned that the project is detrimental to fish. While we agree that the antiquated board dam and pipes need to be replaced with a more modern diversion system, that system must include appropriate screens and allow passage for native fish and aquatic habitat, particularly during the Spring. Also, California law (Fish and Wildlife Code #5937) requires that dams and water facilities provide a minimum flow of water to enable species of special concern such as native trout to survive during critical periods. The DEIR fails to do so. Rather than harming fish, we ask that the project work to restore fish habitat.

Our second main concern is the use of spreading basins. Our experience tells us that the spreading basins are ineffective at recharging the aquifer. The basins are dry almost all of the time, and the ground in them is too hard and dry to be effective at collecting water. When there is water in the basins, instead of recharging the aquifer, they become full of algae and mosquitoes, creating a health hazard. A far better system would be to take advantage of the natural alluvial canyon because it is filled with sand and gravel that has washed down from the mountains. This is the prime recharge area for the Raymond Basin aquifer that underlies Pasadena. Its natural character and composition, which make it ideal to percolate water into the groundwater basin as it has for several million years, make it far superior to biologically

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sterile, hydrophobic spreading basins that are plagued by evaporation, mosquitos, algae and soil compaction.

Our third concern is that the EIR fails to evaluate the cumulative effects of the ASCP and the County's massive sediment removal project that is directly downstream of the project.

There is a better way to improve water resources while protecting the rare nature of Hahamongna. PAS recommends a revised ASCP program that includes:

- a minimum environmental flow for fish and aquatic species of 3 cfs in the Spring;
- no "engineered" stream material, and
- using a living river and natural stream hydrology to allow the water to percolate into the groundwater basin rather than spreading basins.

Again, we thank you for the opportunity to comment.

Sincerely,

Laura Solomon, President (signed)