

*Friends of*  
SOUTH PASADENA  
NATURE PARK

June 29, 2025

Christina Monde, P.E.  
City of Pasadena, Department of Public Works  
100 North Garfield Ave, Suite N306  
Pasadena, CA 91101

Re: Scoping Comments for Arroyo Seco Water Reuse Project EIR

Dear Ms. Monde,

Friends of South Pasadena Nature Park has been working for the past 20 years to restore four acres of parkland along the Arroyo Seco. Our organization has contributed thousands of hours of volunteer time, including over 3,000 person-hours in the past two years alone. We have collaborated extensively with more than 40 partners, including South Pasadena city departments, local Scout groups, Bank of America's My Environment program, the Pasadena Audubon Society and numerous other community organizations. For the past three years, we partnered with the City of South Pasadena and South Pasadena Beautiful to organize annual Sustainability Fairs that reached approximately 300 community members each year.

Through our extensive restoration work in the Arroyo Seco Woodland and Wildlife Park, we have gained valuable insights that directly relate to the environmental challenges facing the proposed Arroyo Seco Water Reuse Project sites. Our experience has demonstrated two critical lessons: first, that any site disturbance creates conditions favoring non-native invasive species, making subsequent restoration efforts exponentially more difficult; and second, that successful ecological restoration requires sustained, long-term commitment and continuous management by individuals with specialized restoration expertise.

Given our organization's deep experience with Arroyo Seco ecosystem restoration and the project's location within this sensitive watershed, I respectfully submit these scoping comments for the Environmental Impact Report (EIR) for the proposed Arroyo Seco Water Reuse Project. While we recognize the project's potential water supply benefits, we are concerned about significant environmental impacts, particularly those affecting habitat

restoration and the broader goal of Arroyo Seco Watershed restoration. Therefore, I request that the EIR provide comprehensive analysis of the following critical issues to ensure full compliance with CEQA requirements.

### **Key Areas Requiring Thorough Environmental Analysis**

**Project Alternatives Analysis** The EIR must evaluate nature-based solutions, including bioswales, infiltration basins, and similar green infrastructure approaches. The analysis should examine upstream pollution control measures, phased restoration approaches, and a comprehensive no-project alternative that could achieve water quality goals with reduced environmental impacts. Projects that minimize site disturbance should be prioritized, as they offer the best opportunity for successful habitat restoration.

1. **Biological Resources Impact Analysis** The EIR must include comprehensive biological surveys documenting existing riparian ecosystem functions, wildlife usage patterns, and cumulative habitat loss analysis. Critical assessment is required for the impacts of removing 142 trees (including 42 protected trees) out of a total of 195 counted trees across both sites, with realistic timelines for replacement habitat functionality. The analysis must include alternative projects that preserve existing native trees and shrubs and minimizing soil disturbance.
2. **Arroyo Seco Stream Restoration Compatibility** The EIR must evaluate projects that align with over 20 years of established Arroyo restoration plans and other watershed initiatives. This includes the Arroyo Seco Restoration Study announced by LA County Supervisor Kathryn Barger in March 2024, which will identify essential improvements to the channel, maximize ecosystem restoration, and ensure flood protection for surrounding communities. The proposed addition of pipes, pumps, artificial filters, and lined wetlands contradicts these long-standing and ongoing plans to restore natural hydrologic function and improve habitat along the Arroyo Seco. The analysis should include an alternative that removes the concrete lining in San Rafael Creek just above its confluence with the Arroyo Seco, allowing natural stream flow to create wetland habitat and establish a natural connection to the Arroyo Seco.
3. **Consultant Expertise in Nature-based Solutions** Rather than continuing with engineering-oriented consultants, the project should engage consultants experienced in nature-based stream restoration and water quality mitigation. This approach would align

with Safe Clean Water program goals and modern stream management practices appropriate for the climate change era.

4. **Hydrology, Water Quality and Water Rights** The EIR must provide current water quality data, detailed TMDL compliance modeling, downstream flow impact assessment, and comprehensive analysis of legal authority to divert water, including the 62 acre-feet guaranteed to the City of South Pasadena for golf course irrigation as stated in the Community Outreach Meeting on April 27, 2023. The analysis should present alternatives that improve water quality by addressing pollution at its source, including mitigation for polluted runoff from San Pascual Stables and the Arroyo Seco Golf Course. Climate change resilience analysis is also required.
5. **Restoration Plans and Long-term Stewardship** The EIR must detail specific plans and identify dedicated resources for the ongoing work required for successful habitat restoration. This includes specifying how the cities of South Pasadena and Pasadena will fund qualified staff or experienced contractors to restore and maintain native plant habitat in perpetuity. Project proposals requiring significant site disturbance—including vegetation removal, land grading, and installation of grey infrastructure—must demonstrate commitment of the substantial resources necessary to restore and maintain healthy habitat conditions.
6. **Long-term Operations and Maintenance** Given the complexity of proposed infrastructure, the EIR must analyze long-term operational requirements, municipal capacity for ongoing management, life-cycle costs, and performance monitoring protocols. The analysis must demonstrate that the cities have committed and will maintain the resources necessary for infrastructure maintenance. This must include regular removal of accumulated silt and debris from artificial pools, ponds, or basins, if such structures are built.
7. **Construction Impacts** The estimated 17-month construction period noted in the MND requires detailed analysis of air quality, noise, traffic, and recreational impacts affecting multiple jurisdictions and park users. The EIR should prioritize alternatives that accomplish water quality goals while minimizing construction-generated pollution and community disruption.

8. **Tribal Consultation** Consistent with AB 52 requirements, the EIR process must include meaningful consultation with the Gabrieleno Band of Mission Indians – Kizh Nation, who were identified by the Native American Heritage Commission as having sacred land within the project vicinity. This consultation must acknowledge the Gabrieleno Kizh Nation as experts on land use, biological resources, historical resources, and cultural resources, with protection measures prescribed by the Tribal Nation.
9. **Community Engagement** The EIR should establish a comprehensive community engagement program involving stakeholder groups including Friends of South Pasadena Nature Park, Stewards of the Arroyo Seco, the Council of Arroyo Seco Organizations, Save San Pascual Park, and local agencies including the City of Los Angeles. Meaningful participation throughout the planning process is essential—simply announcing results when the draft EIR is issued is insufficient.

### **Essential Requirements**

The EIR must establish comprehensive baseline conditions through current biological surveys, recent water quality data, and existing recreational usage patterns. All significant impacts require specific, enforceable mitigation measures with performance standards and long-term funding mechanisms.

This project as proposed in the MND will eliminate an entire functioning riparian ecosystem and requires thorough environmental analysis to ensure decision-makers and the public have complete information about environmental consequences. Alternatives that preserve this valuable riparian ecosystem while meeting project objectives should be given serious consideration and detailed analysis in the EIR.

Thank you for considering these comments in the EIR scope of work.

Yours,



Barbara Eisenstein  
Founder and Head  
Friends of South Pasadena Nature Park