



**TO: Christina Monde, P.E., Project Manager, City of Pasadena
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RE: Scoping Comments for Environmental Impact Report - Arroyo Seco Water Reuse Project

Thank you for the opportunity to submit our comments.

SAVE SAN PASCUAL PARK is a community-driven, grassroots-led opposition to the proposed Arroyo Seco Water Reuse Project. We oppose the project as planned. We demand a true nature-based solution with stream restoration, coupled with cleaning and stopping contamination at the source, and we ask for a better, longer-lasting solution that would benefit all residents, save the park, and maintain a much-needed wildlife corridor for wildlife.

Groups in opposition to the project: *Save San Pascual Park, Stewards of the Arroyo Seco, Friends of the South Pasadena Nature Park, City of Los Angeles Community Forest Advisory Committee (CFAC), Historic Garvanza Coalition, Highland Park Heritage Trust, Historic Highland Park Neighborhood Council, Arroyo Seco Neighborhood Council.*
Over one thousand residents have signed an opposition letter.

The EIR Must Comprehensively Address All of The Project's Significant Environmental Effects Resulting From:

1. The removal of a tree canopy consisting over 140 mature trees and bushes

- Psychological impact on the community from the loss of access to a public green and open space, including access to an urban forest and water stream, currently used and enjoyed by all.
- Loss of birds and animal habitat.
- Loss of a local riparian ecosystem and an important wildlife corridor connecting to the San Gabriel Mountains to the greater Lower Arroyo Seco.
- Increased noise pollution, including but not limited to, demolition and construction noise, increased freeway noise, ongoing maintenance, noise from intake filters and systems.
- Light pollution from freeway, houses, and sports field lights.
- Increased local air pollution from demolition, comparing mature canopy air filtration versus newly planted trees, and how it will affect groups sensitive to air pollutants, including the effects of additional air pollution on children at the adjacent San Pascual Elementary school.
- Detail the effects of the additional air pollution, to park visitors and physically active people in surrounding communities.
- Projected increase in local heat based on the loss of tree canopy and underground spring water.

2. Water Loss

- Provide specific data about how water capture at the site will reduce downstream flow and detail the effect this will have on downstream habitats, especially in summer months.
- How much water will evaporate annually as a result of building large pools of water.
- Detail pool structure. Will pools be lined or will they infiltrate the local groundwater and feed nearby plants.
- Detail the hydrological conditions at San Rafael and San Pascual sites and their capacity for ground water infiltration and replenishment.
- How will Garfias Spring be incorporated into the project.
- EIR must address the negative impacts this project will have on the whole future implementation of the Arroyo Seco natural restoration if so much water is removed from the Arroyo.
- Detail how the Arroyo Seco Water Reuse Project would prevent a natural restoration to the larger Arroyo Seco San including Steelhead Trout habitat restoration as detailed by the National Oceanic and Atmospheric Administration Steelhead recovery program.
- Loss of water annually (in terms of gallons) that will evaporate due to the loss of the tree canopy.

3. Cleaning the Water/Addressing pollutants

- Provide current and clear data on Arroyo Seco contamination sources (not 10 to 15-years-old data). Include contamination that includes E-Coli and known chemicals, data from north of the San Rafael site to south of the South Pasadena Golf Course.
- Detail where the main sources of pollution are occurring.
- Disclose where filters are located and whether any cleaning or filtration occurs at San Pascual Park.
- Detail location of where the water will be returned to the Arroyo Seco.
- Detail the amount of outfall pollutions coming out from the Altadena outlets in the Hahamongna basin and at the Rose Bowl.
- How will pollutants be addressed at the source, such as Johnston Lake, the South Pasadena Horse Stables, the Rose Bowl or the South Pasadena Golf Course. Provide details in reduction on contamination loads after source reduction is implemented.
- Identify other sources of pollution, best management practices, and/or educational programs that could be implemented to address the bacteria reduction goal.
- How will contamination from the South Pasadena Golf Course and parkland from pesticides and fertilizers be monitored and treated?
- If water is being returned to the Arroyo Seco from the South Pasadena Golf Course, provide details on the water quality that will be returned. If this water becomes contaminated from pesticides and fertilizers, how will this be addressed?
- Provide details on other options and alternatives for cleaning water that have been successful throughout the United States and the world, which could be implemented in the project without any destruction to the local habitats.

4. Water Diversion

- Provide proof of State of California Water Rights to divert millions of gallons of water from the Arroyo Seco to the South Pasadena Golf Course.
- Detail the water journey from San Rafael and back into the Arroyo, in detailed, quantifiable graph with plans. Provide clear details where will water be stored, infiltrated, or returned.
- Conduct a hydrology study that verifies ground water infiltration and recovery at the San Rafael, San Pascual, and the South Pasadena Golf Course sites.
- Provide clear and transparent data showing how much water being proposed to be diverted to the South Pasadena Golf Course annually, and what kind of groundwater infiltration is occurring. Detail if this diversion will be year-round? Detail if diversion will occur in drought years?

- Detail how water capture will change during each season and during times of drought.
- Detail the benefits or negative impacts of taking this amount of water from the Arroyo Seco and only returning a proposed 40% of it to the Arroyo Seco.
- Detail how much will the South Pasadena Golf Course pay for the water they will receive in perpetuity?
- Detail if the Golf Course currently using waters from the Arroyo Seco for watering their lawns.

5. CEQA Guidelines

Project must adhere to CEQA guidelines. The California Environmental Quality Act, Public Resources Code Section 21000 *et seq.* (“CEQA”) requires a stable and consistent project description to facilitate public participation in the decision-making process. EIR must re-assess a measured and realistic assessment of project with all its negative consequences, and not copy and paste MND’s data and conclusions.

6. A nature based alternative

The proposed project in San Pascual Park does not serve the needs of the community and the environment.

- EIR must offer at least 3 other viable Alternatives to the proposed project that include nature-based solutions (as required by Measure W) that consider stream restoration, wetland restoration, connectivity and wildlife habitat preservation, and how they relate to the greater Arroyo Seco restoration plans.
- The preferred project and all alternatives must include input and coordination with community members, including indigenous communities.
- A preferred nature based alternative should include removing contamination at the source.
- EIR should also detail the impact of a “No Build” option.
- The EIR Must Include an Accurate, Stable and Finite Project Description.
- EIR must explore a cost benefit analysis of each alternative.

EIR must also include:

- **Tribal Consultation:** Consistent with AB 52, the EIR process must include meaningful consultation with the Gabrieleno Band of Mission Indians – Kizh Nation who were found by the Native American Heritage Commission to have sacred land within the vicinity of the Project site. This consultation must acknowledge that the Gabrieleno Kizh Nation are experts on the land, biological resources, historical resources and cultural resources and that these resources must be protected in a manner prescribed by the Gabrieleno Kizh nation.
- In the MND process, not all public comments were addressed. The EIR must disclose, report and address all written EIR comments and communications from the public. Any comment submitted to the website must be included (<https://www.cityofpasadena.net/public-works/engineering-and-construction/construction/arroyo-seco-water-reuse-project/#comments>)
- Scoping meeting included very limited information about the project. Previous 2023-24 outreaches were very poor. EIR and Project managers must conduct on-going outreach and clear transparent information about the project to the community at large-Los Angeles, Pasadena, South Pasadena, at a radius of at least 3 miles from site, and include options for community’s input verbal or written. Community must receive dates for meeting and public comment submission at least 30 days in advance.
- As proposed, the Project imposes a substantial burden on surrounding communities without providing any meaningful benefits to those communities. EIR must disclose all impacts to the local community. Detail the benefits, if any, of this project to Los Angeles City residents.

- The EIR must consult and include input from other environmental organizations, scientists, and stakeholders, including, but not limited to: California Fish and Wildlife, Santa Monica Mountain Conservancy, Sierra Club, Los Angeles and Pasadena chapters of Audubon Society, and the Los Angeles Regional Water Quality Board, so that the public at large has a full scope of information to review and address.
- Detail the Long-term Operations and Maintenance. Given the complexity of the proposed infrastructure, the EIR must analyze long-term operational requirements, municipal capacity, life-cycle costs, and performance monitoring protocols. Provide scope of responsibility after the 30 years lease expires.
- Provide legal detail on how granting Los Angeles Park land in perpetuity does NOT violate the LA Charter, Section 594c.
- If Los Angeles Recreation and Parks provides a lease of the land to South Pasadena, how will the City of Los Angeles be compensated for this loss of land annually in perpetuity?
- Provide a detailed biological survey that observes all wildlife in the area, performed during multiple visits, at times when different species would naturally be observed, with the purpose of assessing the impact this project will have on wildlife, with a 30 year projected basis. Special emphasis should be given to wildlife which are species of special concern and potential extinction.
- EIR must explore whether Palm trees on San Pascual are Washingtonia Fillifera or Washingtonia Robusta or both. In the event that the Filliferias are observed, these palm trees must be preserved as they are native and endangered.
- A detailed study of the archeological impact that this project could have, both of indigenous people's tribal artifacts and remains as well as fossilized species and remains. The EIR must implement clear guidelines on how this project will be held or postponed by archeological discoveries, how they will be assessed, protected, and preserved. The EIR must detail the appropriate authority that will be monitoring the findings. Any discovery must have consultation with the relevant experts and authorities. The Gabrieleno Kizh must be the consulting experts for cultural and historical indigenous artifacts and remains. The Los Angeles Natural History Museum must be the consulting authority for fossilized remains.
- EIR must preserve historical integrity of the area including the Hitching post at the Los Angeles side of the park.