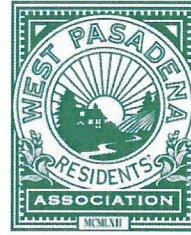


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June 26, 2025

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

Via E-mail: CMonde@cityofpasadena.net

Re: Arroyo Seco Water Reuse Project EIR Scoping Comments

Dear Ms. Monde:

The West Pasadena Residents' Association (WPRA) appreciates this opportunity to provide EIR Scoping comments for the Arroyo Seco Water Reuse Project.

WPRA represents over 7,000 households in southwest Pasadena, almost all of which are within a few blocks of the Arroyo Seco, and many of which are also adjacent to the Arroyo Seco Channel or the San Rafael Creek. WPRA and its neighborhoods are acutely aware of and interested in the Arroyo Seco's preservation, condition, and maintenance.

Topics to be Studied and Analyzed.

WPRA has reviewed the list in the Notice of Preparation of Topics to be studied and analyzed in the EIR that have the potential for significant Environmental impacts, as well as the list of Topics to be excluded. We agree with and support the following list of Topics to be included in the EIR for study and analysis: Aesthetics; Air Quality; Biological Resources; Cultural Resources; Greenhouse Gas Emissions; Hydrology and Water Quality; Land Use and Planning; Noise; Public Services (Parks); Recreation; Tribal Cultural Resources; and Wildfire.

Special Attention for Study and Analysis.

The community, including an extensive list of stakeholders such as WPRA, has worked tirelessly over many years to establish a vision for the future, including restoration, of the Arroyo Seco. In this regard, we support EIR consideration and analysis of all of Pasadena's adopted policies concerning the Arroyo Seco. For example, the Arroyo Seco Master Plan was

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**WEST PASADENA RESIDENTS' ASSOCIATION**  
**POST OFFICE BOX 50252 \* PASADENA, CA 91115**

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adopted by the Pasadena City Council in 2003 and continues to be the roadmap for the planning, preservation and enhancement of the unique and irreplaceable asset that is the Arroyo Seco. WPRA also supports EIR consideration of various studies to restore the Arroyo Seco including its water resources such as the 2006 Watershed Plan for San Rafael Creek, as well as adopted applicable local, regional and State Water policies and plans.

Project Alternatives, Mitigations, and Cumulative Impacts.

Section 21002 of the California Environmental Quality Act (CEQA) law requires that a public agency shall not approve a project as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of the proposed project.

In this regard, WPRA supports EIR study and analysis of a robust number of feasible project alternatives, particularly nature-based alternatives, which will meet goals of environmental restoration and sustainability along with avoiding significant environmental effects of the proposed project. Similarly, as to mitigations, we support EIR inclusion of feasible, specific, detailed, and enforceable mitigation measures that will ensure environmental restoration and sustainability and mitigate significant environmental effects of the proposed project.

Past, current, and planned future Water-related projects are common for the Arroyo Seco. WPRA also supports robust consideration of the proposed project's significant Cumulative Impacts as required by CEQA, including inclusion of feasible mitigations and analysis of adopted applicable local, regional and State Water policies and plans and approved local land use documents.

Thank you for your attention to and consideration of our comments and concerns. Feel free to contact the undersigned at [carlos@verluxenergy.com](mailto:carlos@verluxenergy.com) if you have comments or questions.

Sincerely,



Carlos Javelera  
Vice President  
For the Board of Directors

cc: WPRA Board of Directors  
Steve Madison, Council Member, District 6  
Justin Chapman, District 6 Council Liaison