

June 30, 2025

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To: Christina Monde
Re: Arroyo Seco Water Reuse Project Environmental Impact Scoping Document
From: Mark Forbes

This letter is in response for public input on the Environmental Impact Report being prepared for the Arroyo Seco Water Reuse Project.

As the Environmental Impact Report (EIR) is required to include alternatives to the currently planned project, the following should be considered:

Water Filtration and Cleaning

- **Detail a project alternative that does not include sending any water to the South Pasadena Golf Course.** As the South Pasadena Golf Course is planning a \$25 Million dollar retrofit, their plans should include water capture that does not include taking water from the Arroyo Seco. There are a number of other golf courses throughout the western United States that include native landscaping and water retention alternatives that take no water from local tributaries.
- **The EIR must detail the potential of re-contamination due to the outfall from the South Pasadena Golf Course.** The project proposes to filter the water at the San Pascual site and divert it to the South Pasadena Golf Course before being returned to the Arroyo, which potentially re-pollutes the “clean water” with chemicals, fertilizers, and soil contaminants that exist at the golf course, negating the efforts in “cleaning the water”.

Pollutants and Contaminant Elimination at the Source.

It has been well documented by local residents that overflow from the horse stables during heavy rainstorms produce an inordinate amount of runoff matter in the Arroyo, which clearly contain urine and fecal material.

The EIR must detail an alternative that **eliminates contaminants at the source**. This alternative needs to:

- **Determine where the source contamination is coming from** including testing for coliform bacteria during and after heavy rains above and below the multiple horse stables along the Arroyo Seco in Pasadena and South Pasadena (especially along the San Rafael and San Pascual project sites).

- **Include a plan for its pollution mitigation**, the expected reduction in pollutant load from this mitigation, and the necessity of Arroyo Seco Water Reuse project once the pollutant and contaminant reduction and mitigation program is in place.
- **Implement further mitigation** if above mitigation plan does not significantly reduce the contaminant load sufficiently. Additionally, it should be noted where these additional contaminants are originating from and in those areas as well, how are they being mitigated - prior to the project being implemented.

No Build Alternative

It must be considered in the EIR:

- **If pollutants in the Arroyo Seco have decreased significantly enough as stated about in such mitigation, such that “Clean, Safe” water has been established based on Los Angeles and CA State requirements.**
- **If mitigation is successful, it must be reassessed if a project the size of the Arroyo Seco Water Reuse Project is necessary** by using less costly alternatives – such as a working and ongoing contamination mitigation program and despite the needs of South Pasadena’s request to use water from the Arroyo Seco for the South Pasadena Golf Course.

Ground infiltration

Depending on the public documents that have been presented, it’s difficult to tell if any water will actually be infiltrating the local aquifers, and if any water that is infiltrated into the ground will be taken out at a later time. This must be clearly and specifically outlined and detailed clearly in the Environmental Impact Report:

- **How will the fresh water Garfias Spring be diverted in this project?**
 - **If and how much water is expected to infiltrate the local aquifers?**
 - **If any water is infiltrated into the ground, will this water be taken out by either Pasadena or South Pasadena and if so, how much annually?**
 - **If water is to be removed by either Pasadena or South Pasadena from these aquifers, do these cities have California Water Rights to do so?**
 - **How much water will be collected at both the San Rafael and San Pascual sites annually?**
 - **How it will be determined that the stated water collection numbers will be the maximum at any time?**
 - **How will water be taken from the Arroyo Seco at different times of the year?**
 - **If the same amounts of water will be taken during heavy rainfall years as well as during drought years?**
- How will the volume of water being taken from the Arroyo Seco be reported to the public annually?**

- **State the volume of water that is expected to evaporate annually as a result of creating large pools of water with a large surface areas and waterfalls at each site.**

Water to the Golf Course

It must be clear in the EIR:

- **How much water will be diverted to the South Pasadena Golf Course from the Arroyo Seco at the San Pascual project site,**
- **How much water will be diverted to the South Pasadena Golf Course from the proposed “Water Harvester”, which is planned to be built and implemented further down the Arroyo Seco next to the South Pasadena Golf Course.**
- **The proposed “Water Harvester” must be well documented in the proposed plans and its impact of potential natural restoration to the Arroyo Seco.**
- **Describe and detail how this Water Harvester at the South Pasadena Golf Course complies with the requirements of the California Clean Safe Water Act, and the intended use of Measure W funds of a “nature-based solution” to clean water.**
- **Detail why the “water harvester”, which will be used for the South Pasadena Golf Course should be included in this project to clean the Arroyo Seco tributary.**

Water Rights

It has been stated in a number of instance, both in the Mitigation Negative Declaration, as well as in public comments by representatives from Pasadena, that South Pasadena has diversionary water rights from the Arroyo Seco to the South Pasadena Golf Course because (in summary) “we have been doing this for years.” Additionally, Pasadena has said publically that they have these rights and have been pulling water from the Arroyo Seco to the South Pasadena Golf Course but have stopped doing this because, “the water was too polluted”. Based on California law, if a jurisdiction has been granted water rights but has stopped using them, the rights become forfeit.

In California, a diversionary water right from any body of water is required to have a water rights granted to a city only by the California State Water Board. These rights are publically available for review.

The EIR must include:

- **Public documentation from the State of California of South Pasadena’s current, valid, and publically available documentation of Water Rights to divert water from the Arroyo Seco for recreational use.**