

June 29, 2025

Christina Monde, P.E.  
City of Pasadena, Department of Public Works  
100 North Garfield Ave, Suite N306  
Pasadena, CA 91101  
Email: [CMonde@cityofpasadena.net](mailto:CMonde@cityofpasadena.net)

Re: Arroyo Seco Reuse Project, EIR Scoping Comments

Dear Ms. Monde,

Since the Scoping phase of CEQA accepts public comment on the scope and content of the EIR, this letter suggests some areas to be studied and addressed in the EIR for the *Arroyo Seco Water Reuse Project*. The Project aims to achieve the water quality targets in the Arroyo Seco through diversion, runoff/pollutant capture, filtration, recharge, and release. The Project is situated at the confluence of San Rafael Creek and the Arroyo Seco, which is a major tributary of the Los Angeles River. The Project will affect the future of all three of these waterways. Its impacts will be local as well as regional. To this effect, thorough consideration of the following issues is requested:

1. Include Alternatives that credibly represent Nature Based Solutions as defined by a non profit or governmental entity

The Initial Study lists one of the Safe Clean Water targets for the project as: Prioritization of Nature-based Solutions (NbS). Table 1 in the Initial Study describes NbS measures for the Project as “Landscape plans will include additional native trees, shrubs, and grasses to be installed at select spots impacted by the construction throughout the Project sites. The swales will be sized to convey all the flows from the surface drainage.” This very limited description of natural processes raises concerns about the Project’s use of the term ‘Nature Based Solutions.’

The term ‘Nature Based Solutions’ is often misused, and several aspects of the Project as described resemble grey infrastructure that happens to utilize native plant species. Project elements should be consistent with Nature Based Solutions as defined by entities that have the public interest and global biodiversity community in mind, such as International Union for Conservation of Nature (IUCN). The IUCN definition of Nature Based Solutions served as a model for an actionable definition of Nature Based Solutions for Los Angeles County which is currently being workshopped by a committee led by LA County Public Works and Council for Watershed Health.

If prioritizing Nature Based Solutions is one of the goals of the Project, Project Alternatives that credibly represent different Nature Based Solutions for water quality must be included in the EIR. Project mechanisms for maintaining healthy and complex vegetation and soil microbiomes, and for enhancing the connection between the groundwater table, surface water, and aboveground vegetation, and other the ways natural landscapes clean water, should be explicitly described for each Project Alternative.

## 2. The Project should be consistent with other publicly funded initiatives along the Los Angeles River and Arroyo Seco

Regional waterways such as the Los Angeles River, transcend City boundaries. To date, substantial public resources at the federal, state, regional, and local levels have been invested in plans for restoration of fish passage and fish habitat in our regional rivers. The LA River has been the subject of a number of plans to re-establish fish passage, including the Los Angeles River Fish Passage and Habitat Structures Design (LAR FPHS) Project, and the Los Angeles River Fish Passage Restoration (LAR FPR) Project, funded by public funds distributed by the State of California Wildlife Conservation Board (WCB), Santa Monica Mountains Conservancy (SMMC) with City of Los Angeles as a lead agency. These Projects involved coordination with other partners. At the federal level: U.S. Bureau of Reclamation (Reclamation), National Marine Fisheries Service (NMFS), U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS). At the State level: California Department of Fish and Wildlife (CDFW). At the regional level: County of Los Angeles, Southern California Coastal Water Research Project (SCCWRP), Rivers and Mountains Conservancy. Nonprofits such as Arroyo Seco Foundation (ASF), Stewards of the Arroyo Seco, Council for Watershed Health, Friends of the Los Angeles River (FoLAR), CalTrout, and Trout Unlimited have been invested substantial resources in promoting fish passage.

The Arroyo Seco is a particularly important tributary for fish passage in the LA River because of the high quality habitat in its upper watershed. If funded by public monies, the Project should be consistent with ongoing planning of governments and nonprofits to create refugia and habitat for native fish. This means that the Project should be designed to minimize mortality caused by pipes, pumps, industrial filters, and other infrastructure. Such infrastructure as well as lined wetlands are inconsistent with Nature Based Solutions. The Project should not obviate creation of refugia and fish passage along the Arroyo Seco or San Rafael Creek in the future.

## 3. Vegetation, Carbon sequestration and Maintenance

The Project will remove 142 of the 195 trees in the area, including 42 that are 'protected'. Though new trees will be planted, the loss of habitat and shade will be substantial, and not likely to be reestablished for more than a decade if at all. Given increasingly hot temperatures, this is

a substantial impact on local habitat and neighborhoods.

The large number of trees to be removed, and slow rate of growth of replacement nursery trees (as typically seen in other designed landscapes) raises concerns about whether the benefits of the Project will compensate for its large carbon footprint.

It is well known that other public infrastructure that serves a flood control or infiltration purpose are routinely cleared of vegetation to maintain design capacity and scraped to remove sediments that compromise infiltration rates. Please clarify whether habitat and soils on the site will be allowed to mature and become more complex over time, as in a natural system, or whether it would need to be cleared regularly. Will the vegetation on the site offer habitat suitable for wildlife to breed? Or will the anticipated maintenance regime risk creating a habitat sink? Please describe explicitly what would happen if Least Bell's vireo were to be documented on site.

Given our current biodiversity crisis, and the progression of climate change, it is unfortunate that the CEQA process treats our current situation of degraded habitat and habitat fragmentation as a baseline, offering no incentive to cities or project proponents to improve or enhance or create new habitat. Despite this, I encourage the lead agency and approving entities to consider how the project design can enhance existing efforts to reestablish fish passage and increase habitat for rare birds like Least Bell's vireo, address our current biodiversity crisis, and strengthen the dynamic hydrologic connection between native vegetation communities, surface water, and groundwater in service of water quality.

Thank you for your thorough consideration of these issues.

Sincerely,

Jane Tsong

Pasadena and Highland Park, Los Angeles