Friends of
SOUTH PASADENA
NATURE PARK

July 26, 2026

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

RE: Comments on the Draft Environmental Impact Report for the Arroyo Seco Water Reuse Project (San Rafael and San Pascual Sites)

Dear Ms. Monde:

Thank you for the opportunity to comment on the Draft Environmental Impact Report ("DEIR") for the Arroyo Seco Water Reuse Project. I have reviewed the document and have significant concerns about the adequacy of the analysis in several areas, summarized below. I respectfully request that the City of Pasadena, as Lead Agency, provide written responses to each comment, and that the City consider revising and recirculating the DEIR to address the deficiencies identified, consistent with CEQA Guidelines Section 15088.5 where new information of significance is required.

1. Engineering and Water Quality Impacts of the Project

- Both the San Rafael and San Pascual sites will severely impact downstream flow in the Arroyo Seco, particularly dry-weather flow. By design, the Project would divert and retain the vast majority of dry-weather flow at both sites for treatment, infiltration, and reuse, leaving little to no flow to continue downstream. The DEIR does not adequately analyze the combined effect of this loss of flow on downstream riparian habitat, wildlife, and the existing ecosystem that currently depends on year-round flow through the Arroyo Seco.
- The DEIR fails to analyze the impacts of lateral movement of water from the basins at both sites on the structural integrity of the Arroyo Seco Flood Control Channel.
- The DEIR fails to analyze the possible water quality impacts of lateral movement of water given the high groundwater table at the project sites. ***Will water carrying excessive bacterial or other pollutant loads be allowed to enter the groundwater, and if so, has this pathway been analyzed?***

2. Water Quality

- The DEIR justifies the Project's water purification infrastructure based on the March 2016 Load Reduction Strategy (LRS) developed by the Upper Los Angeles River (ULAR) Watershed Management Group, which called for capturing and treating much of the dry-weather flows at priority outfalls, consistent with the bacteria TMDL compliance approach used throughout the watershed at that time. However, a revised LRS Adaptation Plan was submitted to the Los Angeles Regional Water Quality Control Board on May 31, 2024. Unlike the 2016 program, the 2024 Adaptation Plan focuses specifically on eliminating human waste sources – such as leaking sewer lines, failing septic systems, encampment-related discharges, and illicit connections – rather than addressing total indicator bacteria broadly. The DEIR does not appear to analyze or even acknowledge this more recent, substantially different framework. ***Please identify the specific dry-weather flow capture target the Project's design is based on under the 2016 LRS, explain why the Project's need and***

design are based on the outdated 2016 parameters rather than the 2024 Adaptation Plan, and address whether a source-control approach targeting human waste contributions could address the underlying water quality problem without the loss of the San Pascual wetland and riparian habitat.

- ***Please provide current water quality data for the project area, including all outfalls into the Arroyo Seco Channel above, below, and through the project sites.*** Data should be collected at different times of year, during and after both wet- and dry-weather periods.
- ***Has modeling been performed to demonstrate the effectiveness of mitigating poor water quality at the points where it enters the channel? For example, has water quality at the San Pascual Stables been tested and modeled during and after rain events, given the existing pipe that directs stable runoff into the channel?***
- The cattails (*Typha latifolia*) currently growing in the San Pascual pond will die under every project alternative except No-Build. ***Why have the alternatives not considered bioremediation using cattails and other nature-based vegetation, a well-documented, effective method of reducing bacterial load?***

3. Alternatives Analysis

CEQA requires that the range of alternatives be evaluated against, among other factors, "the alternative's ability to achieve project objectives; feasibility; and ability to eliminate or reduce significant impacts." Measured against this standard, the alternatives presented in the DEIR fall short. The only meaningful reduction or elimination of a significant impact achieved by any alternative is moving the treatment facilities off land owned by the City of Los Angeles. None of the alternatives reduce the greenhouse gas impacts associated with the removal of mature trees and other vegetation, or the destruction of riparian habitat, discussed above. Likewise, none of the alternatives reduce the amount of water removed from the Arroyo Seco Channel, which remains the central driver of the Project's impacts to downstream flow, the San Pascual wetland, and riparian ecosystems. An alternatives analysis that varies only the location of identical infrastructure, without varying the scale of water diversion or vegetation removal, does not meaningfully satisfy CEQA's requirement to evaluate alternatives capable of reducing the Project's significant impacts.

All of the alternatives evaluated, with the exception of the No Project alternative, retain the same built infrastructure as the prior Mitigated Negative Declaration (MND). As a result, the alternatives fail to address numerous concerns raised during the comment period, including:

- Reliance on industrial infrastructure rather than truly nature-based approaches;
- Ongoing maintenance burdens associated with the proposed infrastructure;
- Destruction of the existing San Pascual wetlands by diverting water away from the gully, which would dry out the wetland and lead to the loss of riparian vegetation;
- Failure to evaluate genuinely nature-based approaches, such as ecological restoration using unlined wetlands and source-control measures targeting known high-bacterial-load locations, including the San Pascual Stables and the Arroyo Seco Golf Course; and
- Reduction of downstream dry-weather flow in the Arroyo Seco.

Moreover, to the extent the DEIR dismisses nature-based alternatives as inadequate to meet the urgency of TMDL compliance, that dismissal rests on the 2016 LRS framework and does not account for the May 2024 LRS Adaptation Plan discussed above. Because the 2024 Adaptation Plan reframes the compliance problem around eliminating specific human waste sources rather than reducing total indicator bacteria broadly, the urgency rationale used to reject nature-based, source-control alternatives in favor of the

proposed industrial infrastructure has not been reassessed in light of this more recent, substantially different regulatory framework. The DEIR should not be allowed to rely on outdated 2016 urgency to foreclose nature-based alternatives without first addressing whether that urgency still applies under the 2024 Adaptation Plan.

Alternative 2 (San Pascual Park Tree Conservation Alternative): Despite its name, this alternative does not actually conserve the trees it claims to protect. The trees in this area have relied on the existing water diversion and flow pattern for nearly 100 years. The DEIR confirms at page 4-18 that the existing diversion to the San Pascual wetland would be closed under Alternative 2. Closing this diversion would cut off the water source these trees and the wetland have depended on for almost a century, resulting in the wetland drying out and dying, even though the trees themselves would not be directly removed by construction. An alternative that leaves mature trees standing while eliminating the water supply they and the surrounding wetland need to survive does not meaningfully conserve them, and the DEIR should not characterize Alternative 2 as a tree conservation measure without acknowledging that it would, in effect, kill the wetland it claims to preserve.

Alternative 3: The DEIR does not provide sufficient detail for this alternative to allow for meaningful public review and comment. ***Please clarify and expand this analysis.*** The DEIR confirms on page 4-27 that the same is true under Alternative 3: the existing diversion that currently delivers water to the San Pascual wetland would likewise be closed, resulting in the same loss of the wetland's primary water source, drying out, and death of the wetland and its riparian vegetation as under Alternative 2. The DEIR should disclose this consequence clearly in its discussion of Alternative 3, rather than leaving it to be inferred from a single reference deep in the impacts analysis, and should explain why an alternative that also results in the death of the San Pascual wetland is being presented as environmentally preferable.

Therefore, the alternatives are more destructive than the Project itself and do not take most of the opposition comments raised during the comment period into account. An alternatives analysis in which every option results in the death of the San Pascual wetland, while none reduces the Project's greenhouse gas impacts, vegetation loss, or the volume of water removed from the channel, fails to provide the range of genuinely distinct, less environmentally damaging options that CEQA requires.

4. “Water Reuse” and Water Rights

- ***How much water will actually be “reused” by this Project?*** The DEIR is inconsistent, citing 30 acre-feet/year in one location and 60 or 62 acre-feet/year in another. ***Please reconcile these figures.***
- *Project officials have stated that the amount of water diverted to the golf course will not change.* ***How much water does South Pasadena currently use to irrigate the Arroyo Seco Golf Course, and what proportion is diverted Arroyo Seco water versus municipal water? How much water has been diverted historically?***
- The DEIR does not justify or provide supporting documentation for the 30 acre-feet/year figure cited for golf course irrigation. I have made two separate California Public Records Act requests to the City of South Pasadena seeking official documentation of this number, and have also emailed the City Manager and the Deputy Director of Public Works directly requesting this information. As of this letter, I have received no response or supporting documentation from the City on this point. ***Please provide the underlying data, methodology, and source documentation used to calculate the 30 acre-feet/year figure.***
- The Project includes off-site infrastructure at the Arroyo Seco Golf Course, including a water harvester, reservoir tank, and related facilities. Taken together with the unsubstantiated 30 acre-feet/year irrigation figure and the lack of transparency around the golf course's existing water use,

this off-site infrastructure raises the concern that the Project functions, at least in part, as a means for the City of South Pasadena to upgrade its golf course water infrastructure under the framing of a water quality and "safe, clean water" project. ***Please clarify the independent utility of the off-site golf course infrastructure, whether it would be built or funded absent the golf course irrigation benefit, and how its inclusion is justified as necessary to achieving the Project's stated water quality objectives.***

5. Historical and Cultural Impacts

- The project site contains a Native American burial site, and the ***DEIR's analysis of impacts to this resource should be clarified and strengthened.***
- The Kizh Nation has expressed opposition to the Project. ***Please describe how this opposition, and the concerns underlying it, have been considered and addressed in the DEIR's cultural and tribal cultural resources analysis.***

6. Landscaping Plans

- Riparian plant specimens generally require either irrigation or placement in areas that remain moist or wet year-round, yet most cannot survive inundation. The landscaping plans do not appear to address these conflicting requirements in sufficient detail. ***How will plants along the edge of the artificial ponds be kept healthy with the likelihood of varying water availability that maybe related to upstream water release and other non-weather dependent factors.***
- Many other native plants, particularly trees, require good drainage and dry conditions for most of the year. Without knowing how much water will be retained in the basins, and whether lateral movement of water above the liner will occur, it is not possible to determine appropriate plant placement or survivability. ***How will you plan for irrigation needs under these varying and unpredictable conditions?***
- ***How long will the temporary irrigation system remain in place, and what maintenance oversight will it receive?*** The irrigation system installed for the Arroyo Seco Woodland and Wildlife Park failed within six months of installation and had to be shut off due to constantly leaking, broken irrigation heads. ***Will this Project have adequate staff and resources to monitor and maintain its irrigation system on a near-daily basis? How is this being funded?***
- ***How will South Pasadena fund long-term maintenance of the landscape and irrigation system? Is this cost included in the 30-year maintenance agreement, and what happens after the 30-year term expires? Will South Pasadena have to apply annually to the Safe, Clean Water Program for funding for maintenance? How will South Pasadena fund maintenance if they do not receive future funding through the Safe, Clean Water Program?***
- ***Who will be responsible for maintaining the landscape?*** South Pasadena currently contracts with Parkwood Landscape Maintenance for park maintenance; neither Parkwood nor the City has demonstrated proficiency maintaining natural landscapes of this type and scale. ***Please explain how the city's poor maintenance record for natural landscapes will be improved upon for this project. Who will be responsible for actually doing the maintenance work?***

7. Effects on the Neighboring Residential Area

- ***Has the DEIR considered the light pollution impacts from nearby playing fields and golf course that would result from the removal of trees that currently buffer this lighting? Please provide evidence.***

- ***Has the DEIR analyzed the noise and air quality consequences of removing riparian woodland? Please provide evidence.***
- ***The DEIR appears to conclude that construction-related noise and air pollution cannot be mitigated; please confirm this is an accurate characterization of the DEIR's conclusions and, if so, explain what additional measures were considered and rejected.***
- ***Has the Project analyzed the ongoing noise and odor impacts of the pumps and filtration equipment that would operate continuously?***
- ***Has the DEIR analyzed the Project's contribution to the urban heat island effect resulting from the loss of mature tree canopy?***
- The DEIR states that grading and soil disturbance would occur within approximately a quarter mile of an elementary school (DEIR, p. 1-16). I object to this aspect of the Project. Grading of this scale generates fugitive dust and other air pollution in close proximity to children attending the nearby school and using the parkland and playing fields. The DEIR should fully analyze and mitigate this exposure. Furthermore, this portion of the Arroyo Seco was used as a dump in the mid-20th century. ***Beyond the dust ordinarily expected in soil, has the City conducted soil testing to determine whether hazardous chemicals or contaminants are present in the material to be graded and disturbed, given this history of dumping? Please provide the results of any such testing, or explain why none has been conducted before grading is permitted this close to a school, recreational fields, and residential areas.***
- This portion of the Arroyo Seco was historically used as a dump. ***Has the Project analyzed the safety of excavating, bulldozing, and relocating this material, both during and after construction?***

8. Infiltration Benefits

The Executive Summary states that the Project provides both water quality and infiltration benefits. Given the high groundwater table and shallow bedrock documented elsewhere in the DEIR, ***please clarify the basis for concluding that meaningful infiltration benefits will be achieved at these sites. Do the reduced infiltration benefits satisfy funding through the Safe, Clean Water Program?***

9. Greenhouse Gas Emissions

Does the DEIR's greenhouse gas emissions analysis include the estimated emissions resulting from the removal of existing mature trees and riparian vegetation at both sites? The loss of established woodland and riparian habitat eliminates existing carbon sequestration capacity and may release stored carbon, and this loss should be quantified and included alongside construction and operational emissions estimates (e.g., from the pumps and filtration equipment that would operate continuously). ***Please clarify whether vegetation-removal-related emissions, and the corresponding loss of future sequestration from the mature canopy being removed, were accounted for in the DEIR's greenhouse gas analysis and, if not, why not.***

10. Cumulative Impacts

The San Pascual site is understood to be the first of four projects planned by the City of South Pasadena, all of which intend to use diverted Arroyo Seco stormwater to irrigate South Pasadena parklands. ***Does the DEIR include an analysis of changes to flow in the Arroyo Seco resulting from the combined effect of this Project and the three other sites identified in the City of South Pasadena's Arroyo Seco Parkland proposals?*** Given that each subsequent project would compound the reduction in dry-weather

flow already caused by this Project, a cumulative impacts analysis addressing flow, water quality, and habitat across all four sites is necessary for the public and decision-makers to understand the full scope of change to the Arroyo Seco before this first project is approved. ***Please provide this cumulative impacts analysis.***

- CEQA requires that a cumulative impacts analysis consider the combined effects of past, present, and reasonably foreseeable future projects, not just the Project under review in isolation. In addition to South Pasadena's three other planned Arroyo Seco Parkland sites, the analysis must also account for other current and planned projects within the City of Pasadena that affect flow, water quality, and habitat along the Arroyo Seco and its tributaries, including the Hahamongna Watershed Park sediment management and restoration efforts and any other Pasadena stormwater capture, flood control, or habitat projects in the watershed. ***Please identify all such projects considered in the cumulative impacts analysis and explain the methodology used to assess their combined effect on downstream flow and ecological conditions.***

11. Public Outreach and Language Access

- Since the City notified the public that it had agreed to prepare a DEIR, there have been **no additional public outreach sessions** held on the Project. Given the high level of community concern documented during the scoping period, the City should hold additional public meetings to present the DEIR's findings and alternatives before the close of the comment period and again prior to certification.
- The DEIR and related public notices have not been corrected to provide information in Spanish, despite the significant Spanish-speaking population in the communities surrounding and affected by the Project. Meaningful public participation under CEQA requires that affected residents be able to access and understand Project materials. Please provide Spanish-language translations of the DEIR's Executive Summary and key public notices, and hold at least one outreach session conducted in Spanish, to ensure that Spanish-speaking residents are not excluded from this process.

For the reasons described above, I do not believe the DEIR currently provides an adequate basis for informed decision-making as required by CEQA. ***I urge the City to provide the missing data and analysis, give meaningful consideration to genuinely nature-based alternatives, and respond to each of the comments above in writing prior to certification of a Final EIR.***

Thank you for your consideration of these comments. Please contact me if you have any questions or require additional information.

Sincerely,

Barbara Eisenstein
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