

June 28, 2026

VIA EMAIL (cmonde@cityofpasadena.net)

Attn: Christina Monde, P.E.
Pasadena Department of Public Works
Garfield Avenue
91101

City of
100 North
Pasadena, California

Re: Arroyo Seco Water Reuse Project Draft Environmental Impact Report

Dear Ms. Monde:

I submit these comments regarding the Arroyo Seco Water Reuse Project (the Project) Draft Environmental Impact Report (DEIR) on behalf of community members united under the name Save San Pascual. My comments pertain to the biological evaluation of the San Pascual and San Rafael areas of the Project. I have reviewed the DEIR prior to attending a conference call with members of Save San Pascual and California Department of Fish and Wildlife (CDFW) on June 3, 2026, concerning the Project. I conducted a site visit of areas of the Project on June 8, 2026. My comments pertain to the biological evaluation of the Project site areas and are informed by more than 30 years of experience evaluating habitat function and restoration potential throughout California.

DEIR Lack of Functional Habitat Information

My comments focus on the characteristics of the structure, refugia, and food sources for the variety of organisms that utilize the site either year around and as seasonal or migratory components of the habitat. These characteristics are what is termed the functional aspects of the existing conditions of the Project site. The biological section was a based on two Spring surveys in 2023 and 2025 which is insufficient to document the full functional value of the sites. From the outset of the Biological Section of the DEIR, the descriptions of the San Pascual and San Rafael sites ignore both sites' functional character by slicing the sites into smaller vegetation categorizations that obscure their overall functional value as well as the importance of the specific biological components that contribute within the sites.

The Project is adjacent to Arroyo Seco, an important regional ecological corridor, linking the San Gabriel Mountains to the Los Angeles River and supporting wildlife movement through one of the most urbanized landscapes in California. The Arroyo Seco is mapped as a major connection for a large-scale conservation project linking the San Gabriel Mountains with large open space blocks in northeast Los Angeles (Zellmer and Goto 2022). The biological assessment of the Project site dismisses any functional aspect as part of this important wildlife corridor or as habitat refugia along this corridor even though the Project site occupies mainly natural areas along the Arroyo Seco.

The San Pascual site is a natural habitat that is lightly disturbed as indicated by the number and age/size of Coast Live Oaks (*Quercus agrifolia*) and Western Sycamore (*Platanus racemosa*) that I observed. The trees are documented in the biological section of the DEIR; however, their functional significance to wildlife and the local community is not discussed in relation to their number, age and size. In fact, the importance of native trees such as Coast Live Oaks is only discussed at the end of the biology section and only in relation to the landscape planting and tree replacement as mitigation for their loss. This disjunctive analysis of the functional significance of components of the site does not facilitate decision makers' ability to understand the existing conditions at the site prior to potential impacts which is an essential goal of an EIR per the California Environmental Quality Act.

There is no discussion in the site existing conditions or impact section of the fact that oak trees in North America have the highest diversity and abundance of insects when compared to other common trees (Tallamy and Shropshire 2009). In fact, as previously mentioned, there is little discussion of insects in the biological section of the DEIR until the mitigation is discussed as providing more native trees in the Project design landscape plan which would promote insect diversity. But why is the functional importance of the existing Coast Live Oak trees not discussed in the site description or impact section? Coast Live Oak and Western Sycamore trees were found to be used by foraging birds in greater proportion than their availability in the Los Angeles cityscape of street trees (Wood and Esain 2020). These tree species' functional importance within the Project site due to their age, size and structure, is likely due to insects within their canopies, and their removal is more significant to local wildlife than presented in the DEIR. Again, this lack of discussion within the site description existing conditions of the Project site does not offer the ecological information to inform decision makers of the local relevance of the site, nor the ecological relevance of the Project impacts. Rather, the ecological relevancy of Coast Live Oak trees is only discussed in relation to the landscape design as mitigation for the loss of this important resource.

Additionally, nonnative trees can be functionally important in urban settings and at the urban-wildland interface. For example, Chinese Elm (*Ulmus parvifolia*) was found to have the highest preference among Los Angeles' street trees for both migratory and year around bird species (Wood and Esain 2020). However, the functional significance of the large Chinese Elm at the site is not discussed but dismissed as a nonnative resource. Regardless of their origin, mature Mexican fan palms (*Washingtonia robusta*) have become an important structural component of the urban ecosystem. Numerous bird species, including owls, orioles, wrens, finches, sparrows, woodpeckers, doves, and raptors, use these trees for nesting, roosting, perching, or nesting material. The DEIR dismisses these trees based solely on their nonnative status without evaluating the ecological functions they currently provide. The lack of discussion of the impact to bird species present at the site from removing 83 mature Mexican palm trees is a deficiency of the DEIR. The functional ecological facts are missing that lead to simply dismissing this loss of trees as nonnative, and therefore not important to the functioning of the San Pascual site for wildlife.

Similarly, the Laurel Sumac-Elderberry habitat at the San Rafael site is dismissed as having no value because it has a nonnative understory. Since there is no meaningful description of insects within this habitat, there can be no assertions of a lack of important understory habitat. No mention is made of the functional importance of the Blue Elderberry (*Sambucus nigra ssp. caerulea*) shrubs or the Laurel Sumac (*Malosma laurina*), both of which are important food for sources for year around bird species. Blue Elderberry is especially important to bird species (Clark et al. 2023, Nell et al. 2023).

The biological evaluation of the Project site does not acknowledge any aspects of the relationship of soil organisms with the sites' trees and plants. Eighty percent of land plants form mutualistic relationships with soil symbionts that increase plant functional productivity and improve the carbon sequestration in both plant canopy production above-ground as well as below ground in the root biosphere. These soil symbionts, mainly mycorrhizal fungi, reduce soil carbon loss by extending root lifespan and by improving soil aggregate formation (Deyn et al 2008). Tree species that associate with ectomycorrhizal fungi, including Coast Live Oak, show a strong biomass increase in response to elevated CO₂ regardless of nitrogen availability in the soil (Terrer et al. 2016), and this translates into carbon sequestration. Carbon storage is affected by photosynthesis and soil respiration, which have been studied extensively in natural and agricultural systems. Therefore, it is important to consider the soil biosphere when calculating impacts from removing soil. The biological section of the DEIR does not consider these impacts, nor does the planned landscape mitigation consider the soil ecosystem, including mycorrhizal fungi, in the plan. Topsoil salvage beneath the protected and significant Coast Live Oak, and Western Sycamore that can be

temporarily stored near the project for use in the landscape plan would help to mitigate the loss of soil ecosystem components.

The DEIR has a vague landscaping plan for the Project presented as part of the design and to serve as mitigation for the loss of significant trees, but there is no consideration of the impacts from the length of time that the mitigation trees will require to achieve similar size of those lost within the Project site, and therefore, the EIR does not consider the long term temporal impacts of removing 23 protected and/or significant trees from this habitat. Based on the lack of functional assessment of the Project sites in the DEIR, it is unclear how the functional value of the site will be replaced and evaluated after planting of the landscape plan. The landscape plan design as mitigation gives little detail of target plant and animal species or the developmental milestones that will be used to assess the physical and functional trajectory of the site. Based on the lack of detail in the landscape plan, this measure is insufficient to provide information as to whether it will mitigate for the physical and functional loss of habitat. Ecological function is not determined solely by plant species; it is also determined by age, structure, and time. Mature trees provide habitat complexity that cannot be recreated or mitigated through replacement plantings for decades.

Additionally, there are some discrepancies with the recent count of dead trees. Likely, the trees were assumed dead or dying when counts were taken so soon after recent small fires. Over my field experience, I have had the opportunity to revisit areas that were assessed within 2 years of fires, and many of the trees that were originally assessed as dying had recovered over the intervening 10 – 15 years. The dead tree counts should be clarified in the DEIR.

Deferred Mitigation

No bat surveys were performed for the Project biological assessment. Rather than performing bat surveys as part of the biological assessment to determine the potential scope of impacts to bats, the DEIR includes deferred mitigation measure MM Bio-4 that will be implemented no more than two days before habitat removal and prescribes a protocol for tree removal, if and when any bat roosts or a “small colony” are discovered. The mitigation measure is deficient in several ways. No qualifications for the bat biologist nor an accepted methodology are included in the deferred mitigation. Bat surveys require specific acoustic methodology (Remington 2016). The lack of initial bat surveys, coupled with this deferred mitigation measure does not provide the decision makers with adequate information on bat roosts within the Project site prior to a decision on the Project. Additionally, the impact to removing bat roosts will still be adverse with this mitigation measure, and this fact is not disclosed in the DEIR. Additionally, the mitigation measure alludes to not only bat roosts but also the potential to find a ‘small colony’ of bats. Previously, in the biological section, bat colonies within the Project site were dismissed as not present, nor does the DEIR discuss what constitutes a ‘small colony’ of bats, or a significance of a colony versus a roost. The idea that a ‘small colony’ may be detected during construction, or two days before removal of a tree, makes this mitigation measure insufficient as it does not describe what actions would be required to move a ‘small colony’ safely, if one were found.

Similarly, the aquatic resources evaluation and the dismissal of the Project site for fish habitat is inadequate considering that community members routinely observe small fish within the dry flows through the San Pascual site and at other sites in the vicinity. For example, on June 5, 2026 community members observed rainbow trout just 1.2 miles upstream of the Project (see Stewards of Arroyo Seco comment letter and addendum letter to the City of Pasadena concerning the Project). There is no discussion of required environmental flows for fish during dry seasons in relation to existing conditions nor with the Project which seems to be a deficiency of the DEIR in assessing impacts to fish and other aquatic wildlife. The treatment and diversion facilities may create new impassable barriers for any

fish and aquatic species. At a minimum, the DEIR biological assessment should discuss the Project in relation to the recent Los Angeles County plan to pursue removal of the concrete lining from Arroyo Seco to improve habitat for wildlife, including fish. It seems the Project is counterproductive and possibly obstructive for future projects to improve the habitat value of the Arroyo Seco for fish and other wildlife.

Cumulative Impacts

California Department of Fish and Wildlife (CDFW) and others requested information on cumulative impacts from removing water on the Arroyo Seco, the Los Angeles River and associated downstream wildlife. DEIR does not appear to study cumulative impacts of other projects on aquatic species.

The cumulative impacts analysis should also evaluate the ongoing regional loss of urban habitat resulting from wildfire management, infrastructure expansion, redevelopment, and other public projects that remove mature plants and habitat. The DEIR does not include a discussion of projects that contribute to habitat loss relative to the Project.

Conclusion

In summary, the DEIR does not adequately characterize the existing ecological functions of the Project site, resulting in an underestimation of the project's biological impacts. Without a more complete assessment of habitat function for both the San Rafael and San Pasqual sites, the lack of bat surveys, and the long-term temporal loss associated with mature plant removal, the DEIR does not provide decision makers with sufficient information to evaluate the Project's environmental consequences under CEQA.

References

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Qualifications

Margot Griswold, Ph.D. has over 30 years of experience with native plant communities in California and specializes in habitat restoration and land management. She has prepared restoration/ revegetation plans and supervised implementation and monitoring for projects totaling over 14,000 acres of various habitats. She is experienced in complex, multi-stakeholder projects and worked closely with clients, and federal, state, and local agencies to plan and implement project-specific, workable, and cost-effective ecological programs. She has worked on habitat restoration and reclamation projects throughout California and is widely acknowledged as a leader in this field. She is recognized by resource agencies for preparing ecologically appropriate revegetation and restoration plans. She is past president of the Society for Ecological Restoration, California.