

Los Angeles Audubon Society
P.O. Box 411301
Los Angeles, California 90041



June 30, 2026

VIA EMAIL (cmonde@cityofpasadena.net)

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

Re: Arroyo Seco Water Reuse Project Draft Environmental Impact Report

Dear Ms. Monde:

Los Angeles Audubon Society has been a voice for birds and conservation in Los Angeles for over 115 years. Our mission is to promote the study and protection of birds, other wildlife, and their habitats throughout the diverse landscapes of the Los Angeles area. We have over 9,000 members and supporters, most of whom live in the Los Angeles Basin.

Los Angeles Audubon Society was founded near the Arroyo Seco in the neighborhood of Garvanza, perched above the Arroyo as it bends south toward the Los Angeles River. Our founder, Harriet Williams Myers, was drawn to the giant live oaks, sycamores, and fresh streams of Arroyo Seco, a landscape that was equally appreciated by Indigenous people who used and tended this landscape for thousands of years.

Our territory as a chapter of National Audubon Society includes the neighborhoods in the City of Los Angeles that reach up to and include the City of Los Angeles portion of the proposed project. We have received significant concerns from our members, who oppose this project's implementation. Our Board, at a meeting on June 22, 2026, voted to oppose this project and offers the comments below on the Draft Environmental Impact Report (DEIR).

Our first observation is that the biological surveys to support the DEIR were not adequate. Vegetation and wildlife surveys were conducted on a single day with one follow-up visit. Special-status plant surveys were conducted on a single day. This level of effort is insufficient to find special-status species, and targeted survey approaches are needed to find species such as bats. Although the project includes a bat mitigation measure (MM BIO-4), the proponent should instead identify where bats are using the site and avoid the impact. Acoustic surveys are necessary to do this properly (Comer et al. 2014, Remington 2016). Furthermore, the

mitigation measure does not offset the impact because any roost trees would still be removed. Not killing the bats while removing their roost is still an adverse impact.

The DEIR claims that the project site, which lies along the Arroyo Seco, “does not function as a critical or regionally important wildlife movement corridor for native species, nor is it expected to provide essential connectivity between larger blocks of intact habitat” (p. 3.3-9). This assertion is made without reference to any documentary evidence, camera trap data, or other information upon which to base this conclusion. Furthermore, the City of Pasadena [General Plan Update: Open Space & Conservation Element](#) specifically lists the Arroyo Seco in its section on “wildlife habitats and corridors,” where it commits the City to “[i]dentify, protect and expand wildlife corridors and habitat areas on public, private properties, Eaton Canyon and the Arroyo Seco” (p. 30, 2012). The DEIR cannot claim that this site along the Arroyo Seco is not functioning as a regionally important wildlife corridor when it is listed as a wildlife corridor in the City’s own General Plan. Finally, 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 project proposes the permanent removal of 1.23 acres of a Sensitive Natural Community (Coast Live Oak-Western Sycamore Woodland) and proposes the planting of saplings as a design feature offsetting this loss. Saplings do not offset loss of mature woodland on any time frame relevant to the impacts. Mature woodlands provide irreplaceable services such as foraging, roosting, and nesting habitat that cannot be replaced through new plantings. In a public park, there should not be loss of Sensitive Natural Communities at all, but rather avoidance of significant impacts.

Mitigation of Sensitive Natural Communities must be done on an area basis, not a per-tree basis. Coast Live Oak-Western Sycamore Woodland has a rarity score of S3 (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153398>). Mitigation of an S3 Sensitive Natural Community requires a mitigation ratio by area (not by number of trees) between 2:1 and 5:1 depending on the guidance of the Trustee Agency (California Department of Fish and Wildlife). The project does not include any formal mitigation measure for this impact and instead relies on an argument that somehow the project design will offset any significant impacts. The project design, however, does not contain mitigation by area as required for loss of Sensitive Natural Communities, and therefore the impact from the loss of 1.23 acres of Coast Live Oak-Western Sycamore Woodland remains significant as currently proposed.

Furthermore, there are not even performance standards for the implicit vegetation mitigation, and the design of the mitigation is improperly deferred. Specifically, the DEIR states, “The number and type of trees proposed on the conceptual landscape plan may be refined as part of permitting processes with the affected agencies (i.e., City of Pasadena and CDFW)” (p. 3.3-35). This is improper deferral of the mitigation measures. The project landscape plan is relied upon in determining whether the project will have significant adverse impacts on the environment and therefore its design and details cannot be deferred.

We are concerned by the loss of six mature blue elderberry (*Sambucus nigra* ssp. *caerulea*) trees. This species supports high densities of invertebrates that are important for foraging by native birds in southern California (Clark et al. 2023, Nell et al. 2023). Large specimens of this species have extremely high ecological value and impacts on them should be avoided. Furthermore, blue elderberry is of cultural importance to the native people of the area (see Longcore and Ethington 2023). Blue elderberry presence further supports Kizh Nation Chief Andrew Salas's request for avoidance of the location.

Claims about the impact of diverting water are not supported. The DEIR claims, "[T]here is no habitat being supported by runoff downstream of the sites that would be adversely affected by the 320-acre feet average annual water capture for water supply resulting from Project implementation" (pp. 3.3-39–40). No hydrological analysis supports this assertion. The Arroyo Seco has riparian habitat downstream. Capture of 320 acre-feet per year from currently perennial and intermittent flows (including from natural, spring-fed sources) could materially reduce dry-season base flows available to riparian vegetation, invertebrates, and wildlife. The DEIR must include a quantitative hydrological analysis modeling pre- and post-project flow regimes, identifying downstream reaches likely to experience reduced base flows, the timing of those reductions, and assessing impacts to riparian vegetation and associated wildlife.

The DEIR does not analyze impacts of vector control activities on non-target aquatic and terrestrial invertebrates, stating, "The Project would also have a vector [i.e., mosquito] minimization plan based on guidelines outlined in the California Department of Public Health's Checklist for Minimizing Vector Protection in Stormwater Management Sources" (p. 2-21). Most of the items on the checklist are design features, and some items affect the functioning of the constructed wetland as habitat for wildlife. For example, this guidance emphasizes the need to keep cattails and bulrushes from becoming dense. What management actions will be taken to reduce vectors? Will this involve any pesticide or insecticide applications or regular removal of normal vegetation growth? The DEIR must analyze impacts on aquatic macroinvertebrates, native bees, odonates (dragonflies and damselflies), and other native invertebrates expected to colonize the constructed wetland features.

The project sites are zoned Open Space in all three jurisdictions (Pasadena, South Pasadena, City of Los Angeles). The San Pascual site is adjacent to and functionally integrated with Arroyo Park. The DEIR does not analyze the public trust implications of converting publicly owned open space to permanent utility infrastructure. Publicly owned open space should not become the default location for infrastructure simply because it is publicly owned and apparently available.

Sincerely,

A handwritten signature in black ink, reading "Travis Longcore". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Travis Longcore, Ph.D.
Conservation Co-Chair

Literature Cited

- Clark, K. B., K. Ferree, K. Fischer, and S. J. Myers. 2023. Foraging preferences of the threatened coastal California Gnatcatcher (*Poliioptila californica*) during the non-breeding season. *Journal of Field Ornithology* **94**:6.
- Comer, C. E., L. A. Stuemke, M. L. Morrison, and R. W. Maxey. 2014. Comparison of systematic roost searches and acoustic detection to determine occupancy of rare forest bats. *Wildlife Society Bulletin* **38**:103–110.
- Longcore, T., and P. E. Ethington, editors. 2023. Mapping Los Angeles Landscape History: The Indigenous Landscape. Spatial Sciences Institute, University of Southern California, Los Angeles.
- Nell, C. S., R. Pratt, J. Burger, K. L. Preston, K. K. Treseder, D. Kamada, K. Moore, and K. A. Mooney. 2023. Consequences of arthropod community structure for an at-risk insectivorous bird. *PLoS ONE* **18**:e0281081.
- Remington, S. 2016. Bat surveys of the Baldwin Hills, Los Angeles County, California, 2014–2015. Pages 72–101 in T. Longcore, editor. Urban Biodiversity Assessment: Baldwin Hills Biota Update. University of Southern California for Baldwin Hills Conservancy (Proposition 84) and Baldwin Hills Regional Conservation Authority (Proposition A), Los Angeles.
- Zellmer, A. J., and B. S. Goto. 2022. Urban wildlife corridors: building bridges for wildlife and people. *Frontiers in Sustainable Cities* **4**:954089.