



July 30, 2020

Elisa Ventura, P.E.
City of Pasadena Department of Water and Power
150 South Los Robles Avenue, Suite 200
Pasadena, California 91101

VIA EMAIL: eventura@cityofpasadena.net

Re: Comments on the Draft Environmental Impact Report (DEIR) for the Arroyo Seco Canyon Project (ASCP), Areas 2 and 3

Dear Ms. Ventura:

The West Pasadena Residents' Association (WPRA) represents 7000 households near and interested in Pasadena's Arroyo Seco. Many of our members enjoy the area that would be subject to the direct impacts of the proposed Arroyo Seco Canyon Project in the upper Arroyo—especially the creation of very large new, and likely ineffective, spreading basins in designated natural areas. Because the project would increase diversions of water from the Arroyo stream, our members are also concerned about downstream effects. Adverse impacts would extend to all three segments of Pasadena's Arroyo by reducing the already scant flow of the natural arroyo stream in critical periods, further desiccating riparian areas.

We appreciate the opportunity to offer these comments on the draft EIR for the Arroyo Seco Canyon Project. We cannot support the project as proposed, and believe that the draft EIR is defective: it avoids consideration of viable superior alternatives, fails to use best available science to analyze environmental impacts, and errs in evaluating cumulative effects.

Pasadena's Department of Water and Power provides our members and neighbors with water, and WPRA supports rational steps to increase the local supply of groundwater to replace water imports. However, given objective evidence of the failed performance of the existing spreading basins, we do not believe that the proposed project would materially increase available groundwater recharge, and would do so at the cost of reducing both stream flow and valuable habitat areas. Other options, not fully considered in the EIR, would provide greater quantities supplemental water at lower cost.

Alternatives

The stated purpose of this phase of the ASCP is to reconstruct a damaged diversion structure to capture more water (up to 25 cubic feet per second) from the Arroyo Seco stream for conveyance to a settling pond and existing and new spreading basins. The basis for the city's

proposed action is the contention that increased diversions and a significant expansion of spreading areas will increase percolation into the subsurface aquifer(s) allowing Pasadena to eventually claim additional groundwater (1100 acre feet/year). That contention is not adequately substantiated, and the best existing evidence is that percolation rates would be scanty.

The city states that the proposed restructured/rebuilt diversion will be used to take all of the water in the Arroyo Seco stream, apart from flow during major storm events. The Arroyo Seco stream rarely reaches 25 CFS, even during moderate rains. While the city's pursuit of more local water supplies is creditable, the removal of all of the water from the Arroyo Seco stream would be ecologically highly destructive. The EIR errs in determining that biological impacts will be rendered insignificant without meaningful mitigation.

Alternatives exist and require analysis in the EIR. First, the natural stream bed is significantly more permeable than the spreading basin sediments, and leaving water in the stream would both increase percolation and support water dependent ecosystems. A 1995 study commissioned by the city (Converse Associates) found that percolation rates from spreading basin alluvium were orders of magnitude less than recharge from stream bed gravels. It is not clear why the city has not focused on taking advantage of that disparity. It may be that Pasadena's groundwater credits from the Raymond basin are limited to certain areas. If so, that issue should be discussed.

Other alternatives to satisfy the city's primary goal—to use surface water to increase legally extractable groundwater—also exist. For example, if the pool behind Devil's Gate dam were allowed to fill—as it has been in the past—that water, once the sediment settles, could be pumped back up to either the natural stream or to existing spreading basins, or both. The water that could be stored in a pool behind the dam is a valuable resource, the use of which the city should examine fully in the EIR for this project. The Devil's Gate dam pool is mentioned in the EIR, but its use is not considered as an alternative.

Cumulative Impacts and Mitigation

The need to greatly expand spreading basin area must be evaluated against the need to enhance natural areas in the Arroyo Seco. The County's removal of significant habitat behind Devil's Gate Dam without providing for adequate in-basin mitigation points out the need to restore and replace ecologically important habitat in the arroyo. An alternative that is less environmentally destructive would return all or most of the area proposed for new spreading basins to habitat (primarily area in the former JPL east parking lot).

The LA County Flood Control District's Devil's Gate Dam multi-year sediment removal project when combined with the city's proposed ASCP plan wipes out much of the habitat value of the upper Arroyo Seco. The city's diversion of all of the water from the stream would exacerbate the impacts of the county's project. The city's claim that the diversion would enhance potential fish habitat is not a credible or worthy response to the overall impacts of the complete desiccation of the arroyo stream. The EIR should analyze in detail how these two projects would operate together to limit habitat, and look for less destructive alternatives and mitigation that would avert their ecological consequences. CEQA requires that significant impacts be mitigated, and,

contrary to the initial study, the impacts on species and both surface and groundwater of this proposed project are significant. Mitigation in the form of decreased stream take in the dry season and increases in habitat area would seem necessary and appropriate.

Use of the Best Available Information

As noted previously, the city's contention about percolation rates in spreading basins is unproven: in fact, the best science-based studies seem to disprove the City's assumptions about spreading basin recharge rates. Because of sediment plugging and mechanical compaction, the existing spreading basin rates are likely to be only a tiny fraction of the assumed rates. There is no information presented that proposes to evaluate these studies, nor that new spreading basins would not fall prey to the same phenomena.

The EIR needs to examine the city's proposed plan in detail in light of what is known—the existing studies-- about recharge rates and examine alternatives against the likelihood that other options, particularly allowing stream flow to conduct a large share of the recharge, may well be superior for the city's as well as the environment's purpose. It would seem incumbent on the city to understand scientifically, and to inform the public, on the best options to recover groundwater and protect the natural values of the Arroyo Seco.

Thank you for your consideration of our views on this important project.

Cordially,



Dan Beal
President, West Pasadena Residents Association
For the WPRA Board of Directors

C: Councilman Steve Madison
Takako Suzuki, Field Representative
Steve Mermell, City Manager

The WPRA is an all-volunteer organization dedicated to maintaining and enhancing the quality of life in southwest Pasadena. We represent 7,000 households, including 1,000 paid members.