

Attachment "G"



Arroyo Seco Water Reuse Project at San Pascual and San Rafael
Project Manager- Christine Monde
City of Pasadena Department of Public Works
100 North Garfield Avenue, Suite N306
Pasadena, California 91101

Re: Comments on Draft Environmental Impact Report for Arroyo Seco Water Reuse Project,
SCH No. 2023110605

Dear Ms. Monde:

The Community Forest Advisory Committee (CFAC), created by the Los Angeles City Council, connects residents with City departments, elected officials, and policymakers to preserve our urban forest. After reviewing the Draft Environmental Impact Report (DEIR), CFAC opposes the Arroyo Seco Water Reuse Project in its current design.

CFAC is concerned about the advisability, legality, and environmental impacts of removing a park. San Pascual Park has historical significance for the Kizh Nation and is enjoyed by the community to this day. Its protected, native, and significant non-native tree canopy provides a natural haven for people and wildlife. Highland Park is considered park-deficient relative to its number of residents. The project plans to lease 0.5 acres of Los Angeles in perpetuity, changing the nature and use of the park, which violates LA Charter 594C.

Taxpayer-funded projects such as these that impact public spaces have a duty to engage with, listen to, and respect communities' needs. According to the 2025 Parks Needs Assessment, unprogrammed green spaces are the most in-demand outdoor facility across the City. They serve multiple purposes for the community, including space for large, native tree species. There is insufficient analysis of conflicts with existing land-use regulations.

Councilmember Ysabel Jurado of Los Angeles Council District 14, in which San Pascual Park is located, has issued a resolution opposing the project and the giveaway of LA parkland.

https://cityclerk.lacity.org/online/docs/2026/26-0777_misc_5-22-26.pdf

The project's pollution mitigation goals do not align with the results. CFAC questions the environmental impacts versus water cleaned and who it benefits. Pasadena's Water Reuse Project at San Pascual would be permanent infrastructure on LA parkland, serving as a water reclamation site primarily for a South Pasadena golf course. CFAC calls for a renewed approach to preserve this existing water treatment wetland and its mature trees.

1. Consequences of Removing 136 Mature Trees

The project claims to maximize avoidance of trees. It removes approximately 136 mature trees (including protected 19 native and 14 significant non-native) from two parks, along with the mixed understory: 11 coast live oaks (*Quercus agrifolia*), 6 sycamores (*Platanus racemosa*), 2 protected Toyon (*Heteromeles arbutifolia*), and 12 protected elderberries (*Sambucus nigra* ssp. *caerulea*). Saplings are not included in the inventory. 82 trees proposed for removal are identified as Mexican fan palms (*Washingtonia robusta*). A third-party biologist should confirm none are California fan palm (*Washingtonia filifera*), as suspected in the riparian area.

The replacement trees take years to provide comparable ecological functions. The protected, native, and significant, non-native plant species create a functional habitat and support a wide variety of wildlife.

The DEIR dismisses this habitat as a "disturbed" area with "no value" due to its mixed composition. It dismisses its connectivity as a wildlife corridor between the San Gabriel Mountains and Debs Park. By minimizing the value of the habitats, the impacts are declared insignificant. Urban heat island effects will result from the removal of mature trees. Impacts on remaining trees from grading, compaction, and irrigation changes. The trees protected in place will lose connectivity to water, other trees, and nutrients due to construction.

DEIR deficiencies:

- Shade and cooling of at least 15 degrees under the tree canopy versus full sun.
- The open pool design exposes the proposed habitat to humans on all sides.
- Diversity of insect populations that support birds and bats.
- Mitigations offered will not save nesting sites and birds.
- Disclosure of where the replacement plants supplied by the City will be sourced from, nor best management practices to ensure they are grown to prevent nursery pathogens, such as Phytophthora.
- Use of pesticides in proposed replacement habitat.

Travis Longcore PhD LA Audubon writes: "*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....The project design, however, does not contain mitigation by area as required for loss of Sensitive Natural Communities. Therefore the impact*

from the loss of 1.23 acres of Coast Live Oak-Western Sycamore Woodland remains significant as currently proposed”.



Photo 1 - An ancient Coast Live Oak-Sycamore Woodland near the San Pascual stream.

DEIR states that the loss of trees will not have any adverse effect on the area's scenic vista. DEIR concludes both sites will improve overall visual quality and therefore “*no mitigation is required*” (DEIR pg. 127). Turning a forest into an open pit exposed to the sun will result in a negative vista transformation.



Photo 2- Vista as seen from the west side of San Pascual, showing a green belt of trees obstructing the sports field noise and light

2. Pollution from Known Sources, Cleaning and Infiltration

The project's goal is to mitigate elevated levels of E. coli and zinc pollution during dry weather flow. Both sites have demonstrated relatively low contaminant levels compared to the extremely high levels from the Annandale Golf Course, Brookside Golf Course, The Rose Bowl Parking Lot, South Pasadena Golf Course, and San Pascual Stables. However, these projects would remove 100% of the dry-weather flow from a River that is already depleted, thereby negatively impacting downstream flow and its ecology.



Photo 3 - San Pascual Stables piping contaminated runoff toward the Arroyo Seco.

These two projects will achieve a small level of cleanup and infiltration by design and location. Dry weather flow is defined as any flow that occurs at least 24 hours after the last rainfall. Stormwater capture is not factored into the design. Pollution from upstream and downstream sources is not addressed due to jurisdictional issues, costs, and expediency. The project relies on obsolete pollution-priority data from 2012 and 2013. The DEIR should be based on recent data.

The hydrology and water quality analysis is insufficient. The hydrology analysis is considered unreliable because the project's existing conditions are not clearly established. The DEIR fails to evaluate whether increased diversions could reduce flows, affect downstream ecosystems, alter channel conditions, create unintended hydrologic impacts, and compromise the outdated concrete Arroyo Seco Channel.

The geology report states on p. 837 that the bedrock structure will mostly allow lateral infiltration and reduce downward infiltration. The Project's bedrock structure and high water table will allow limited water capture and limited infiltration. The geology report also highlights numerous unverified soil conditions and recommends deeper excavation and on-site examination. p. 841-843. This exposes more unknowns and deficiencies in the project's design.



Photo 4 - Visible seepage from San Pascual into channel through eye holes and cracks.

Ken Kules, retired Senior Water Engineer with the Metropolitan Water District and the US Army Corps of Engineers, states: *"The DEIR's description of Project operations is internally inconsistent and does not clearly describe how diverted flows will be managed under all operating conditions. Based on the operational descriptions provided, the San Pascual site would likely function as a perennial aquatic feature rather than the existing riparian woodland transition zone. The Project appears designed to maximize infiltration of diverted flows to achieve groundwater recharge and treatment through soil infiltration. Under the shallow groundwater conditions documented in the DEIR, those operations could substantially alter existing site hydrology, reduce the effectiveness of vadose-zone treatment, increase the potential for groundwater-quality impacts, and increase hydrostatic pressures adjacent to the Arroyo Seco flood-control channel"*.

3. Air Pollution, Greenhouse Gas, and Public Health Impacts

DEIR fails to account for the climate impacts of removing a dense vegetated area that improves local air quality. Removal will increase GHG emissions. Mature trees filter dust, pollution, and freeway emissions. Replacement trees will take decades to provide comparable protection. This community is burdened by severe freeway-related air pollution. The DEIR dismisses the local impacts that exacerbate health issues. Temporary replacement barriers or other mitigation strategies are insufficient to offset these impacts.

The DEIR acknowledges that mature trees store substantial carbon but does not clearly disclose how much carbon sequestration would be lost. Carbon stored in soil, vegetation, and riparian habitat is unaccounted for.

Additional deficiencies include:

- The total MTCO₂e/yr of 7.92 or 12.41 before sequestration must be assessed.
- Emissions from decomposing or landfilled vegetation.
- Failure to incorporate measures to achieve the project's carbon neutrality.
- Urban heat-island impacts.
- Disclosure of operational and construction emissions from machinery and all vehicles.
- Enforceable dust-control measures.
- Potential contamination in excavated soils.
- Analysis of truck routes near schools, sports fields and other sensitive receptors.

Dr Rocio Rivas (5), Board Vice President, LA Unified School District Board of Education, has expressed serious concern about the health of school children in nearby communities and schools: *"This project poses serious health risks for nearby residents, particularly vulnerable children and seniors. It undermines established environmental restoration goals, relies on outdated or insufficient data, threatens existing wetlands and wildlife habitats, and would impose costly, long-term maintenance burdens. I urge the rejection of this proposal in favor of a true nature-based alternative that restores water quality while protecting both residents and local ecosystems."*

4. Tribal Cultural and Land-Use Issues

The Gabrieleno Band of Mission Indians – Kizh Nation has requested full avoidance of this site. The City of Pasadena failed to consult with the Kizh Nation for the DEIR, instead relying on the consultation for the Mitigated Negative Declaration. Hereditary Chief Salas indicated more consultation was needed because the project had changed.

The DEIR does not comply with CEQA requirements for tribal cultural resources and archaeological resources. It fails to guarantee detailed protection for this sacred site if human remains are found.

5. Inadequate Biological Resource Analysis

The DEIR treats habitat as isolated vegetation patches rather than as a functioning ecosystem corridor connecting the Arroyo Seco to the San Gabriel Mountains. The biological survey missed known features, plants, and animals.

Travis Longcore PHD (1), **LA Audubon Conservation Co-Chair**, environmental scientist and urban ecologist, wrote a letter in which he states: *"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."*

The DEIR shortcomings include:

- Evaluation of mature coast live oaks and western sycamores as an ecosystem.
- Possible undercounting of existing trees, including tree of heaven (*Ailanthus altissima*).
- Failure to recognize habitat value of non-native trees for birds and mammals.
- No bat surveys were conducted before project approval.
- Inadequate mitigation for potential bat colonies. The DEIR acknowledges that bats likely occupy the sites, including special-status species. Mitigation is deferred until 2-3 days before tree removal, which is too late and does not ensure protection of bat colonies.

6. Potential Impacts on Native Rainbow Trout and Steelhead

The Arroyo Seco supports native rainbow trout and is important for potential Southern steelhead recovery. DEIR states: “there is no habitat being supported by runoff downstream of the sites that would be adversely impacted.” (p.217).

The DEIR downplays the presence of trout and fails to analyze:

- Flow reductions.
- Fish passage barriers.
- Construction impacts on aquatic habitat.
- Effects on ongoing and future regional fish restoration efforts.

CA Fish and Wildlife is concerned about flow-reduction impacts: *“The Project does not consider downstream impacts to reasonably foreseeable restoration projects within the LA River watershed and does not consider future water reduction projects in the LA River.”*

Specific impact: *The reduction of flows and water availability in the Arroyo Seco and LA River may significantly affect the hydrologic regime within the immediate area and downstream of the Project location. Significant impacts to biological resources could occur, especially during dry years and/or droughts.*

Travis Longcore, LA Audubon states: *“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.”*

7. Traffic, Noise, and Light Impacts

The DEIR relies on unsupported assumptions about haul-truck volumes and routes. Construction noise impacts on nearby residents, park users, and wildlife are not fully disclosed or mitigated. The removal of mature trees that currently shield nearby homes from nighttime baseball-field lighting is not analyzed. Replacement trees will be too small to provide similar screening.

8. Water Rights

The DEIR offers conflicting information about historical use of diverted water from the Arroyo.

- Unclear ownership and allocation of diverted water.
- Inconsistent descriptions of quantities of diverted water into the golf course and other irrigation needs.
- Failure to disclose legal authority for diversions.
- Lack of analysis of water rights implications for Los Angeles, Pasadena, and South Pasadena.

9. Flawed Alternatives Analysis

The DEIR is defining project objectives so narrowly that meaningful alternatives are excluded. A true nature-based alternative and an Arroyo Seco naturalization alternative were rejected or not seriously considered due to jurisdictional or cost constraints, even though they were more viable and less environmentally destructive.

Instead, the DEIR relies on alternatives that either fail to meet the stated objectives or are designed to appear less favorable than the proposed project. Both options will result in the imminent death of the San Pascual stream and forest due to water diversion under either option. These are unacceptable alternatives that offer only location alternatives, but not true wetland design and restoration as the community requested.

10. Stormwater Capture Versus Dry Weather Flow

The DEIR is inconsistent in its project description and facts:

“The proposed San Pascual BMP can treat 100 percent of dry-weather flows, as required under the Safe, Clean Water Program, while also removing over 70 percent of divertible pollutants in wet-weather runoff. The annual irrigation water demand for the Arroyo Seco Golf Course has been estimated at 30 af/year. The San Pascual BMP has been designed to provide the total estimated annual irrigation water to the Golf Course, thereby reducing demand on potable water supplies. The water diverted for reuse at the Golf Course would be 100 percent dry weather flows.” (ASWR p.2-17)

The city should adopt recycled water infrastructure (like Griffith Park) and golf courses worldwide. The annual irrigation demand is 320 af, captured and not returned to the Arroyo. The water is not 100% runoff. The flows are mainly from springs and the San Gabriel Mountain watershed.

The DEIR mentions wet-weather runoff and conflicts with the description of two dry-weather flow projects (San Rafael and San Pascual Parks). San Rafael design features a low level of infiltration and cleanup. San Rafael design remained unchanged after Outfall AS-41 (San Rafael) was no longer a high-priority dry-weather outfall. The wet weather design should have applied to its new designation as identified by the ULAR Adaptation to the Load Reduction Strategy (p. 44), 2024.

AOI Number ID	Outfall ID	Dry Weather Catchment Priority	Wet Weather Catchment Priority	Segment/Tributary <i>E. coli</i> Load After Outfall Addressed (billion MPN/day)	Structural Projects in Catchment Area (Status)
Arroyo Seco: <i>E. coli</i> WLA = 16.4 billion MPN/day; Baseline = 61 billion MPN/day					
AS_AOI_2	AS-41	Low Priority	High Priority	13	San Rafael Treatment Wetlands (design) Arroyo Seco Golf Course (design) Lower Arroyo Park (design)

Conclusion

The Draft Environmental Impact Report (DEIR) fundamentally reduces a vibrant, living ecosystem to mere numerical data, factoring in the number of trees removed and the number of pools constructed while completely ignoring the human and ecological toll. This proposed project will profoundly disrupt the surrounding community, park visitors, and local wildlife. Instead of offering meaningful solutions, the DEIR dismisses these critical impacts or proposes unworkable mitigations that fail to address the impending environmental destruction.

By examining the project piece by piece, the DEIR fails to recognize the holistic value of what already exists: a functional riparian habitat that simply requires proper maintenance and restoration. The area's current degradation is not a natural state, but the direct result of years of neglect, arson, and invasive species.

The Community Forest Advisory Committee (CFAC) strongly advocates for maintaining the existing wetland and restoring this mature forest canopy. At a time when our cities are experiencing a devastating daily loss of mature trees-which are vital to safeguarding public health and our climate future-we cannot afford to destroy the Arroyo Seco. The community deeply loves this park, and it must be protected.

The DEIR treats the Arroyo Seco as a blank canvas for infrastructure rather than a living ecosystem, a cherished community park, and a culturally significant landscape. Consequently, it drastically understates the project's long-term damage to water resources, wildlife, public health, and recreation.

Natural urban open spaces are irreplaceable. The proposed, artificially engineered "wetlands" will fail to replenish the aquifer, rely heavily on machinery and ongoing maintenance to replicate what nature does naturally, and compromise the stability of the channel. Furthermore, they will yield zero biological value for at least 20 years.

Pasadena must reconsider whether these engineered interventions are worth the irreversible destruction of a rich, cherished biological habitat. Both San Pascual and San Rafael require the care of restoration experts; together, these sites could mark the beginning of a much-needed, comprehensive channel restoration.

In an era of accelerating climate change, protecting existing natural sanctuaries is paramount. Cities must find innovative ways to free our rivers from their concrete prisons, not introduce more artificial infrastructure.

Pasadena must halt this project immediately. The city needs to return to the drawing board, engage directly with the community, consult the historical guardians of these lands, and collaborate with ecological experts to build a truly sustainable plan from scratch.

Sincerely,



Adele Slaughter, Chair
Los Angeles Community Advisory Committee (CFAC)

CC: Mayor Karen Bass, Deputy Mayor for Public Works Randall Winston, Board of Public Works, Steve Kang, Jenny Chavez, John Grant, Faith Mitchell, Ernesto Cardenas, Los Angeles Urban Forestry Division Manager David Miranda, Los Angeles Urban Forestry Policy Permits & Administration Manager Hector Banuelos, Councilmember Ysabel Jurado, Chief of Staff Council District 14 Kevin Ocubillo, Victor Gordo, Pasadena Mayor, Councilmember, Steve Madison, Councilmember Tyron Hampton, South Pasadena Mayor Sheila Rossi, South Pasadena City Council, South Pasadena Board of Public Works, Director Julian Lee, ULAR Upper LA RIVER, Los Angeles Regional Water Board David, State Water Board, Safe Clean Water

Appendix

Experts references and sources

Travis Longcore-PHD LA Audubon Conservation Co Chair, environmental scientist and urban ecologist, adjunct professor UCLA Institute of Environment and Sustainability where he serves as Senior Associate Director and Co-Chair of the Environmental Science and Engineering Program. Science Director of Urban Wildland Group.

Ken Kules Ken Kules, retired Senior Water Engineer with the Metropolitan Water District and the US Army Corp of Engineers

Tim Brick Executive Director of Stewards of the Arroyo Seco. Water and Sustainability Consultant. He has previously served as Executive Director of the Arroyo Seco Foundation, on the board of the Alliance for Water Efficiency, an international leader in water conservation,

and on the board of directors of the Metropolitan Water District of Southern California, where he served for 28 years including two terms as Chairman (2006-2010).

Dr Rocio Rivas PHD Board Vice President LA Unified School District Board of Education

CA Fish and Wildlife DEIR letter to the Water Reuse Project

ULAR Adaptation to the Load Reduction Strategy

<https://storymaps.arcgis.com/stories/466afe14077a436aabd8f072ed20ee2e>

Resolution 26-0777 by Ysabel Jurado Councilwoman CD14

https://cityclerk.lacity.org/online/docs/2026/26-0777_misc_5-22-26.pdf