

**Attachment C - Public Comment Letters and
Corresponding City Responses**



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Adopt Mitigative Declaration Study / Mitigated Negative Declaration

June 22, 2021

Project Name: The Garfield Replacement Well Project Located: 586 North Garfield Avenue, Pasadena

We have received your Notice of the Adopt Mitigative Negative Declaration for the Garfield Replacement Well Project. Our Tribal Government would like to be consulted if any ground disturbance will be conducted for this project.

1

Sincerely,
Gabrieleno Band of Mission Indians/Kizh Nation
(1844) 390-0787 Office

Andrew Salas, Chairman
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians@yahoo.com

gabrielenoindians@yahoo.com

Letter No. 1 Gabrieleno Band of Mission Indians-Kizh Nation

Gabrieleno Band of Mission Indians-Kizh Nation

P.O. Box 393

Covina, CA 91723

July 23, 2021

Response

Response 1-1

The Draft Initial Study and Mitigated Negative Declaration includes Mitigation Measure MM TCR-1 which would ensure compliance with retaining a qualified native American Monitor who is culturally affiliated with the Project area and/or otherwise approved by the Gabeieleno Band of Mission Indians-Kizh Nation Tribal Government to observe ground-disturbing activities, which may included, but are not limited to, pavement removal, pot-holing or augering, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project Area.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3562
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life.

June 28, 2021

Sandra Andrade-Hernandez
City of Pasadena Water and Power Department
150 South Los Robles Avenue, Suite 200
Pasadena, CA 91101

RE: Garfield Replacement Well Project –
Mitigated Negative Declaration (MND)
SCH # 2021060461
GTS # 07-LA-2021-03627
Vic. LA-210/PM R25.63

Dear Sandra Andrade-Hernandez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The proposed Project would drill and construct a replacement potable water supply well in the City of Pasadena, California, to maintain source capacity. The existing potable Garfield Well has reached the end of its useful service life and has been removed from service. The replacement well would be capable of producing 1,500 gallons per minute of water, which is comparable to the previous operational capacity of the Garfield Well. The Garfield Replacement Well would be located approximately 100 feet northwest of the existing Garfield Well in Villa Parke, which is a City park. The City of Pasadena Water and Power Department is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located near the Interstate 210 (I-210) and State Route 134 (SR-134). The MND states "Construction workers, equipment delivery vehicles, and haul trucks are expected to access the site via the I-210 or SR-134 at the Fair Oaks or Lave Avenue off-ramps." From reviewing the MND, Caltrans does not expect project approval to result in a direct adverse impact to the State Highway System.

However, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, including the I-210 or SR-134, please submit a construction traffic control plan detailing these issues for Caltrans' review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2021-03627.

Sincerely,

Emily Gibson

EMILY GIBSON
Acting IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Letter No. 2 Caltrans District 7, IGR/CEQA

Emily Gibson, Acting IGR/CEQA Branch Chief
100 S. Main Street, MS 16
Los Angeles, CA 90012

July 23, 2021

Responses

Response 2-1

The California Environmental Quality Act ("CEQA") (California Public Resources Code §21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, §15000 et seq.) require that local government agencies, prior to taking action on projects requiring discretionary approval, consider the environmental consequences of such projects. Pursuant to Section 15367 of the State CEQA Guidelines, the City of Pasadena ("City") is the Lead Agency for the Project. As the Lead Agency, the City has the principal responsibility for carrying out the Project and has the authority for approving the Project and its accompanying environmental documentation.

Response 2-2

The applicant will comply with the permitting requirements noted in the comment for any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways. While at this time it is not anticipated that construction traffic will cause issues on any State facilities, including the I-210 and SR-134, should that change, then the applicant will comply with submitting a construction traffic control plan detailing these issues for Caltrans' review.

Andrade-Hernandez, Sandra

From: City Web
Sent: Tuesday, July 6, 2021 3:21 AM
To: PWPGarfieldWell
Subject: Garfield Well Webpage Feedback Form

Name Ginger Berglund

Email gingermaracuja@gmail.com

Message Hi,

The current MND that you've provided us is only a brief summary of the complete study? Do you have a scan/e-copy of the full text of the IS/MND, with the full discussion of potential environmental effects? I'd like to read it, thanks.

1

What is the current size of the aquifer into which you are drilling? How many gallons does that represent? How quickly, on average, does it refill?

2

Why didn't you choose other old and unused well sites closer to the source of the major drainage sites and water lines of the Arroyo Seco and Eaton Canyon? Why not sink a new well to these sources on what seems to be a more fruitful source of drainage for a longer time into the future? As per Groundwater Elevations Fall 2013 (figure 6), it appears you have chosen one of the least productive sources in the city. Why didn't you choose Jourdan, Craig, or Monte Vista for this project?

3

If your experts are only "on call", and not on site, (for example, the paleontologist), then your unqualified construction workers will be the ones to decide if the site has yielded something of cultural or historical significance?

4

Will you be recording baseline decibel levels at the drilling site BEFORE you begin construction? If not, why not? Why are you using STC levels in the MND, instead of decibel levels, to address the mitigation of sound pollution?

5

You have explained well why drilling must proceed 24/7. Why do you need to pump water 24/7? Why not just during the day?

6

What are your plans when the well runs dry?

7

Thank you,

Ginger Berglund
(310) 428 5515

Letter No. 3 Ginger Berglund

Ginger Berglund

July 23, 2021

Responses

Response 3-1

Thank you for your comments. I am unable to email a copy of the IS/MND because the file is too large. Please click on the link below to access the IS/MND from the project website:

<https://ww5.cityofpasadena.net/water-and-power/wp-content/uploads/sites/54/2021/06/Garfield-Replacement-Well-Draft-IS-MND.pdf>

Response 3-2

The Raymond Basin covers approximately 40 square miles and is bounded on the north by the San Gabriel Mountains, on the south and east by the San Gabriel Valley and on the west by the San Rafael Hills. At its deepest point, it is more than 1,000 feet measured from ground surface. The total volume of the Raymond Basin is approximately 244 billion gallons. This number varies year by year depending on precipitation.

Response 3-3

PWP is drilling a replacement well at Villa Parke because there is existing infrastructure at Villa Parke. The existing Garfield Well building will house the new electrical equipment and there is an existing 12-inch discharge line that runs from the existing well building to the Sunset Reservoir on Mountain Avenue where the water from the well will be stored and utilized. Most of the active wells are in east Pasadena. This well will balance pumping in the Raymond Basin since it is located in west Pasadena.

Jourdan Well has been off-line since 1996 due to mechanical and water quality issues. The well will be destroyed and abandoned in the next year.

Monte Vista Well has been off-line since December 2007 due to issues with sand and perchlorate. The well will be destroyed and abandoned in the next year. The existing site does not provide adequate space to drill a replacement well.

Craig Well has been off-line since December 2006 due to mechanical issues. PWP is currently assessing the issue and will make repairs as needed. The well will be back online after completing additional piping work.

Response 3-4

The Contractor for the well drilling work shall be responsible for retaining a qualified Native American Monitor who is culturally affiliated with the Project area and/or otherwise approved by the Gabrieleno Band of Mission Indians-Kizh Nation Tribal Government to observe material excavated from the conductor borehole to the final completion depth of the conductor borehole.

Letter No. 3 Ginger Berglund (responses continued)

In accordance with the AB52 Consultation between the Owner and the local Native American Tribe, the Contractor will be required to contain and preserve all material excavated from the conductor borehole and shall make the material available for inspection by an archaeologist, or representative of the local Native American Tribe, for a period of five (5) consecutive working days following excavation.

Response 3-5

Baseline decibel levels (i.e., ambient noise levels) were measured proximate to the drilling site, at the nearest noise sensitive uses to the Project site, as described on page 4-56, under “Existing Ambient Noise” of the Draft IS/MND. As stated in this section, an ambient noise measurement program was initiated on April 11, 2021 to document existing noise levels at the nearest noise sensitive uses proximate to the Project site. Noise measurements were taken for a 24-hour period at the property line of multifamily residential uses located along North Garfield Avenue, west of the Project site, and near 380 Parke Street (Reinway Court), east of the Project site. Additionally, ambient noise measurement data was provided in Appendix G of the Draft IS/MND for informational purposes. It should be noted that the City’s noise guidelines for construction projects are based on Section 9.36.070, Construction Projects, of the City’s Municipal Code, which restricts construction noise based on time of day and day of the week, and Section 9.36.080, Construction Equipment, which restricts construction noise based on a set noise level limit of 85 dBA. As such, the City’s construction noise restrictions are not based on construction noise above ambient noise levels.

Sound transmission class (STC) is also measured in decibels and is used to measure the ability of a building material/sound barrier to absorb sound (HUD 2009). The noise mitigation measures provided in the Draft IS/MND provide quantifiable sound reduction measures by classifying the sound barrier’s effectiveness to reduce sound (i.e., a material with a STC of 25 would reduce sound by 25 decibels).

Reference:

U.S. Department of Housing and Urban Development (HUD). 2009 (March, published). HUD Noise Guidebook. Washington, D.C.: HUD. <https://www.hudexchange.info/resource/313/hud-noise-guidebook/>.

Response 3-6

Constant starting and stopping of a well can damage the pump over time. The Garfield Replacement Well will be equipped with a submersible pump which will be installed approximately 400 feet below ground surface, effectively eliminating the noise and other above-ground impacts when operating.

Response 3-7

The Raymond Basin is an adjudicated aquifer that is managed by the Raymond Basin Management Board (“RBMB”). RBMB utilizes policies and tools to monitor and help manage the basin such as the implementation of a 30% reduction in groundwater pumping by some member agencies to reduce the rate of decline in the groundwater levels. PWP and other members of the RBMB continue to make needed investments in resource programs to replenish the aquifer.



July 19, 2021

City of Pasadena
Attn: Sandra Andrade-Hernandez
150 South Los Robles Avenue, Suite 200
Pasadena, California 91101

DRAFT CITY OF PASADENA (CITY), MITIGATED NEGATIVE DECLARATION (MND),
GARFIELD REPLACEMENT WELL PROJECT (PROJECT); STATE
CLEARINGHOUSE NUMBER 2021060461

Dear Ms. Sandra Andrade-Hernandez:

Thank you for the opportunity to review the MND for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board) is responsible for issuing water supply permits administered under the Safe Drinking Water Act and will require a new or amended water supply permit for the above referenced Project. A project requires a permit if it includes water system consolidation or changes to a water supply source, storage, or treatment (California Code of Regulations, title 22, chapter 16 et.seq).

The proposed Project will drill a 36-inch wide by 950-foot deep replacement water supply well in the City of Pasadena, California, to maintain source capacity. The existing potable well (existing Garfield well) has reached the end of its useful service life and has been removed from service. The new Garfield replacement well will include a submersible pump and be capable of producing 1,500 gallons per minute (gpm) of water. (This is comparable to the previous operational capacity of the existing Garfield well, which produced an average of 1,417 gpm of water before decommissioning.)

The replacement well will be located approximately 100 feet northwest of the existing Garfield well on a newly installed 16-ft² concrete pad in Villa Parke, a City park. Existing electrical components will be replaced for the construction and operation of the project. An 8-foot tall, 150 foot² chain link fence with an access gate will be constructed around the well for security and safety. The old well building will remain to house the electrical equipment. The new well will pump to the future Sunset complex. The Sunset complex will be built as a separate project in the future to replace the Sunset reservoir with new storage tanks and treatment systems. Prior to this, the water may be used for in-line blending for drinking water or irrigation purposes at the park.

The State Water Board as a responsible agency under the California Environmental Quality Act (CEQA), has the following comment on the District's draft MND:

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

Karen Wong

- 2 -

July 19, 2021

Please clarify if the well will be connected to the existing Sunset reservoir- as it is, prior to the construction and implementation of the Sunset Complex Project or if the well be connected to the storage tank/s only after the replacement storage tanks and new treatment tanks are put into place.

3

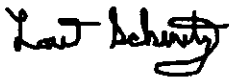
When the review process has ended, please forward the following items with your permit application to the State Water Board, Los Angeles Metropolitan Office:

- CEQA Documents
 - The draft and final MND and Mitigation Monitoring and Reporting Plan (MMRP)
 - The Resolution or Board Minutes certifying and adopting the MND and MMRP and approving the Project;
 - The date stamped Notice of Determination (NOD) filed at the Los Angeles County Clerk's Office or Governor's Office of Planning and Research, State Clearinghouse, and
 - Any comment letters received and the District's responses, as appropriate.
- Permit Supporting Documents
 - A copy of the destruction permit for the replacement of the Garfield Well.
 - A written request for a variance from the required setback for the storm drain manhole.

4

Please contact Karen Wong at the Los Angeles Metropolitan District Office, at (818) 551-2037 or email at Karen.Wong@waterboards.ca.gov if you have any questions regarding water supply permitting requirements.

Sincerely,



Lori Schmitz

Lori Schmitz
Environmental Scientist
Division of Financial Assistance
Special Project Review Unit
1001 I Street, 16th Street
Sacramento, CA 95814
Lori.Schmitz@waterboards.ca.gov
(916) 449-5285

Cc:

Office of Planning and Research, State Clearinghouse

Karen Wong
Associate Sanitary Engineer

Karen Wong

- 3 -

July 19, 2021

Los Angeles Metropolitan District

Letter No. 4 State Water Resources Control Board, Division of Drinking Water

Lori Schmitz, Environmental Scientist
Division of Financial Assistance, Special Project Review Unit
1001 I Street, 16th Street
Sacramento, CA 95814

July 23, 2021

Responses

Response 4-1

The City of Pasadena will apply for an amended water supply permit from the State Water Resources Control Board, Division of Drinking Water.

Response 4-2

The comment is noted. No further response is required because the comment is a summary of the Project.

Response 4-3

The Garfield Replacement Well will be connected to the Sunset Reservoir after the replacement storage tanks and new treatment system are put into place.

Response 4-4

The comment is noted. The City of Pasadena will submit the items listed in the comment.

Andrade-Hernandez, Sandra

From: Karla Berglund Hughes <musability@sbcglobal.net>
Sent: Tuesday, July 20, 2021 5:01 PM
To: Andrade-Hernandez, Sandra
Subject: Garfield Replacement Well Project

CAUTION: This email was delivered from the Internet. Do not click links or open attachments unless you *know* the content is safe. Report phish using the Phish Alert Button. [Learn more...](#)

I strongly object to the Garfield Water Well plans in my neighborhood of Villa Park and urge you to stop it immediately.

I find it interesting that this historically neglected neighborhood of Pasadena was targeted to have its contaminant water well resurrected.

There is also a serious equity issue here. Most of all of the active wells in Pasadena are located above the 210 freeway, with the exception of 2 wells located slightly below the freeway. Most of the active wells are not in the affluent areas of Pasadena. Do you think those affluent citizens of Pasadena would accept a noisy drilling monstrosity and the constant truck exhaust in their neighborhood? Somehow I think not, and is it any wonder why my colorful Villa Park has been targeted once again?

Contrary to what is printed on the websites, our Villa Park neighborhood has not been properly notified. Only homeowners got a notice. The vast majority of renters who actually live here have no clue because they were never informed by the city.

I urge you to rethink where a new well should be drilled and I even encourage our city not to drill a well. We need to be better conservators of our water and the future health of our Earth.

Karla Berglund HughesI strongly object to the Garfield Water Well plans in my neighborhood of Villa Park and urge you to stop it immediately.

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Contrary to what is printed on the websites, our Villa Park neighborhood has not been properly notified. Only homeowners got a notice. The vast majority of renters who actually live here have no clue because they were never informed by the city.

I urge you to rethink where a new well should be drilled and I even encourage our city not to drill a well. We need to be better conservators of our water and the future health of our Earth. 4

Karla Berglund Hughes

Letter No. 5 Karla Berglund Hughes

Karla Berglund Hughes

July 23, 2021

Responses

Response 5-1

Information opinions noted.

Response 5-2

Well location is based on proximity to existing water infrastructure, land availability and areas that will produce adequate water supply. PWP is drilling a replacement well at Villa Parke because there is existing infrastructure at Villa Parke. The existing Garfield Well building will house the new electrical equipment and there is an existing 12-inch discharge line that runs from the existing well building to the Sunset Reservoir on Mountain Avenue where the water from the well will be stored and utilized.

Response 5-3

The Notice of Intent ("NOI") was posted at the Los Angeles County Registrar-Recorder/County Clerk office and was sent to property owners within a 500-foot radius of the project site (addresses were obtained from the Los Angeles County parcel database), agencies, organizations, and individuals who have previously requested such notice in writing. The NOI was also posted at Villa Parke on June 21, 2021 within close proximity to the Project site.

PWP presented the project to the Recreation and Parks Commission on November 10, 2020. PWP met with the Parks, Recreation and Community Services Department in November 2020 to discuss measures to minimize impacts to the Villa Parke community center programs and provided an update in 2021. PWP initiated community outreach by meeting with the Pasadena Villa Marengo Homeowner's Association ("HOA") in 2019 and 2020 and conducted a presentation in 2021. PWP also conducted a presentation to the Reinway Court HOA in 2021. PWP discussed the project with District Liaisons from Districts 1, 3, 5 in January 2021, and with the District 5 Liaison and the field representative to the Mayor in April 2021. PWP will be conducting another HOA presentation and will mail out notices (or door hangers) to residents and businesses prior to start of construction.

Response 5-4

Information opinions noted.