

Martinez, Ruben

From: Darren Dowell
Sent: Monday, June 07, 2021 7:22 AM
To: PublicComment-AutoResponse
Subject: public correspondence on June 7 City Council meeting, agenda item 12, Arroyo Seco Canyon Project

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June 7, 2021

Pasadena City Council:

This letter is a recommendation to proceed cautiously into the Arroyo Seco Canyon Project, by invoking key modifications to the project to find a better balance between water management, water conservation, and natural resources.

I am a Pasadena resident who became completely smitten with Hahamongna and the Arroyo Seco from the first visit, and I have since logged thousands of hours observing nature within this unique Pasadena treasure. Understandably, many others in the area are similarly enamored with this place.

And those who deeply know the Arroyo are speaking out clearly:

**** Let the stream flow. ****

This is the environmentally-superior approach, achieving the project objective of recharging the groundwater basin. The Hahamongna wash has a natural, maintenance-free method for percolation of moderate and low flow into the aquifer, and along the way, nature will take its fraction to restore natural beauty and the rich ecosystem. In the scenario of a renegotiated method of accounting aquifer replenishment, this is a win on all fronts. With or without the facility update from the Canyon Project, Pasadena could and should let the stream flow unimpeded most of the year, starting now.

In a changing climate, and with increasing demand on water resources, stream flow diversion may be a necessary (but imperfect) approach to support the needs of the Pasadena community. However, this tool must be used with great care, to ensure that the diversion and aquifer recharge credit do not lead to overdrawn from the groundwater or to harm to the areas downstream from the intake. The analysis of potential harm to existing downstream habitat (particularly riparian areas) must incorporate the recent, drastic alteration to the profile of the basin. I believe this leads logically to the conclusion that:

**** Stream diversion is appropriate only to capture a fraction of high flow periods. ****

In wrapping up, I wish to comment on a few of the project details:

- I strongly support invasive species removal and native plantings at the spreading basins. The basins are currently a blight on the land, harboring abundant invasive weeds of low value to wildlife, that once again threaten to spill over into the adjacent alluvial habitat (in which L.A. County has invested significant effort in restoration as part of the mitigation for the sediment removal project). This should be done whether or not the Canyon Project proceeds.

- I strongly oppose the Canyon Project option with the sedimentation forebay (Figure 6-1 of the EIR), which would wipe out a remarkable ecosystem unique to this location where the Arroyo Seco emerges from the canyon and enters the basin.

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- I strongly support protection for fish at the diversion and intake, and a design which allows fish to navigate upstream and downstream, even in low flow.
- Finally, I call attention to the importance of timing construction activities to the seasons with minimum impact to wildlife.

Thank you for considering these recommendations.

Sincerely,

C. Darren Dowell
Pasadena

Martinez, Ruben

From:
Sent: Sunday, June 06, 2021 8:48 PM
To: PublicComment-AutoResponse
Subject: June 7 Council Agenda Item 12. Appeal of Board of Zoning Appeals' Decision

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PUBLIC COMMENT RE: JUNE 7, AGENDA ITEM 12. APPEAL OF BOARD OF ZONING APPEALS' DECISION

The Final Environmental Impact Report (FEIR) for the Arroyo Seco Canyon Project does not address the alternative of restoring natural flow of the Arroyo Seco stream, the permanent damage to vital riparian habitat in the Upper and Lower Arroyo Seco, or the impact on recreation in the City's largest area of open space.

The Arroyo Seco Canyon Project (ASCP) was first proposed 16 years ago and would grant Pasadena Water & Power (PWP) "paper rights" to divert water from the naturally flowing stream during wet months in addition to diverting all water from the stream in dry months, harming important regional ecosystems and interfering with fish migration. While the project itself is 16 years old, the resulting Surface Runoff Spreading Credits that would allow PWP to pump additional water from the Raymond Basin aquifer are based on pre-1914, 100-year-old rights. In order to qualify for the Surface Runoff Spreading Credits, PWP proposes to construct a **new spreading basin at a cost of \$13.9 million**. The purpose of the new spreading basin is for groundwater recharge to the Raymond Basin yet PWP's own engineering studies indicate that **water percolation in the natural streambed, the no-cost alternative**, is far more efficient at sending water into the aquifer than spreading basins are. However, no-cost natural water percolation to the aquifer doesn't deliver the desired Surface Runoff Spreading Credits.

Sixteen years after the project was originally proposed, the region is experiencing a prolonged drought which affects the entire State of California. The Raymond Basin aquifer currently provides approximately 35% of Pasadena's water but has been overdrawn for years, even before the current drought conditions which may represent the new normal because of global climate change. Rainfall is the main replenishing source for the Raymond Basin aquifer but replenishment is greatly reduced and uncertain because of drought conditions. Pasadena Water & Power proposes to increase its pumping of the already depleted Raymond Basin from 35% to 50% of its urban water.

At the May 25 meeting of the Municipal Services Committee, PWP officials indicated that the prominent inclusion of the Arroyo Seco Canyon Project in the *2020 Urban Water Management Plan* (required by the State every 5 years to manage water demand, ensure adequate water supply, and drought/water shortage planning) and *2020 Water System Resource Plan* (planning through 2045 for water sources and infrastructure) did not mean that the project was pre-approved.

I object to the Arroyo Seco Canyon Project because it will contribute to further environmental degradation in the Arroyo Seco, decline in groundwater levels, and endanger the health of the Raymond Basin. **Please instruct Pasadena Water & Power to revise the Final Environmental Impact Report and to recirculate it for review by the members of the public and regulatory agencies.**

Genette Foster
Pasadena 91106

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Martinez, Ruben

Subject: FW: Opinion: The City Council will be asked on Monday to approve the Arroyo Seco Canyon Project - is there a financial case?

From: Morey Wolfson <

Sent: Friday, June 04, 2021 12:39 AM

To: Morey Wolfson <moreywolfson@aol.com>

Subject: Opinion: The City Council will be asked on Monday to approve the Arroyo Seco Canyon Project - is there a financial case?

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Is there a financial case for the Arroyo Seco Canyon Project?

Over the years, Pasadena residents have ramped up their understanding that we are in a fossil fuel-induced global heating emergency. The relentless global carbon loading of the atmosphere has stoked the mega-drought that now encompasses the American West. In addition to bracing for heat waves, elevated fire danger, air quality alerts, and the possibility of blackouts, residents are also increasingly concerned about the possibility that Pasadena may soon face a severe water shortage, brought on in large part by global heating.

Pasadena is facing a summer of cutbacks due to low snowpack in the Sierras that has reduced the allocation of flow down the State Water Project. Reservoirs that provide water to Pasadena are at very low levels. Arizona Central recently reported that since 2000, the water level in the Lake Mead, which is the largest in the country, has dropped about 140 feet. The lake is now just 37% full, headed for a first-ever official shortage and sinking toward its lowest levels since it was filled. The latest projections show that by the end of 2021, Lake Mead will decline below an elevation of 1,066 feet, far below the threshold — 1,075 feet — for the federal government to declare a shortage. That is expected to happen in August, triggering the largest water cuts to date next year for Arizona, Nevada and Mexico. Even larger cutbacks could come in 2023 if the reservoir continues to decline as projected over the next year into a more severe “Tier 2” shortage. Lake Mead's downward spiral is being driven largely by the dire situation upstream at Lake Powell, which has declined to 34% of full capacity. It is during this period of drought, when a conservation budget rate is so needed, that PWP is asking the Council to approve a project that makes no environmental or economic sense.

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Water efficiency and conservation are widely recognized to be the most advantageous ways to protect communities from the worst consequences of a drought. Notwithstanding these realities, it appears at this time, that Pasadena Water and Power (PWP) has its focus on defending a costly, minimal pay back idea - the Arroyo Seco Canyon Project (ASCP).

PWP may have already spent approximately \$6 million on staff and consultants planning the project. The project was created in 1995, and was first funded in 2001. The idea is to divert stream water to new settling basins to percolate water measured by the Raymond Basin Management Board so Pasadena could receive credits to pump water that would have otherwise stayed in the stream. Of note, the management board has not pre-approved the project or the available pumping credits. The Raymond groundwater basin stretches on the north along the foothills from LaCanada Flintridge to Arcadia and to the south, roughly to South Pasadena and Huntington Gardens.

This Monday, the Pasadena City Council has the opportunity to adjust water policy and discontinue support for the ASCP. The Council is urged to chart an actual plan to help arrest the century-long constant drawdown of the Raymond Basin, primarily through aggressive efficiency and conservation policies. The Council should reject the ASCP, ending City policy support for an ill-conceived \$14 million project. Our elected leaders can select from environmental or economic factors to describe why they prefer a cost-free option to avoid an expensive, outdated idea that would divert only a trivial amount of water. If the stream were allowed to flow, it would percolate into the basin, at an amount roughly equal to what the ASCP envisions.

The Arroyo Seco Foundation has gathered over 1000 signatures on a petition from residents. Hundreds have offered a wide range of common sense reasons why the Council should reject the ASCP, primarily over environmental, hydrologic, and reliability concerns.

Is there a financial case for the ASCP? The answer is no.

To help put the \$14 million project into perspective, PWP receives \$63 million in annual water revenues from ratepayers. About a third of that revenue is used to pay for water.

PWP supplies about 30,000 acre feet of water per year to customers. (An acre foot of water would flood a football field 1-foot deep).

About two-thirds of Pasadena's water (approximately 20,000 acre feet) is purchased from the City's sole regional wholesale treated water supplier - the Metropolitan Water District (MWD) of Southern California - at a cost of approximately \$1,000 per acre foot, totaling about \$20 million.

By contrast, about one-third of our water (approximately 10,000 acre feet per year) is drawn from the Raymond Basin. The water is “free.” The cost that PWP pays is for the energy and maintenance to pump and treat, at anywhere between \$200-500 per acre foot, totaling between \$2 million and \$5 million a year.

Ignoring their own earlier hydrologic studies, PWP has been attempting to sell the ASCP, arguing that diverting water from the Arroyo Seco would gain pumping credits of about 800 acre feet per year from the Raymond Basin Management Board - that has not given them a green light. As a comparison, the largest single consumer of water in Pasadena – the Brookside Golf Course demand is estimated to be about 850 acre feet per year. Pasadena has been informed that water expenses at the golf course continues to rise and concerns have been raised that reliance on potable water in the long term is in question.

PWP has centered on the idea that pumping water that they divert from the stream will yield a possible net financial benefit to ratepayers. PWP suggests that the Council should authorize continuation of a project that would plan on spending an additional \$7 million over the next five years. They position the ASCP as a financial move, pointing to pumped water at \$200-\$500 per acre foot compared to MWD water at \$1000 per acre foot. Because the difference is so tiny, PWP has not offered the Council an estimate of what the actual impact of the difference in water cost would be on rates. This has not been offered, because at best, the project would only supply about 2.5 percent of PWP’s total annual water, and damage the Arroyo Seco natural stream and percolation in the process.

Depending on which of two PWP-stated cost figures is correct (\$200 per acre foot, or \$500 per acre foot) for pumping water from the Raymond Basin, it would take somewhere between 21 and 33 years for a payback resulting from PWP paying less for pumping water, rather than paying MWD for an equal amount of water. The first year’s pay back would be about \$500,000 – only about 1.5% of the annual cost that PWP currently pays to procure water.

Council is reminded that when they review an environmental impact report, like the EIR for the ASCP, the report is not designed to evaluate whether projects are financially feasible. That is the job of the City Council to determine, and why this information has been produced for their review.

A small fraction of the project’s money could hire a team of the brightest and best minds to develop a progressive water budget and conservation pricing structure that would yield water savings an order of magnitude more than the ASCP, which would help address the basin’s declining health.

The City Council needs to directly address the folly of continuing to spend money on the ASCP. A far better use of that money would be to actively engage the public in a

process to design a budget and conservation based pricing structure for water. A few years ago, PWP declined to proceed with budget pricing because the City lacked a capable computer information and billing system. Now is the time to design a smart water pricing structure, so the City can timely deploy a new pricing structure that uses its new high capability \$20 million computer system. This will be a big step forward to start saving water at an order of magnitude greater than what the ASCP could yield.

At their meeting this Monday afternoon, June 7, the City Council should direct PWP to abandon the ASCP once and for all, and redirect that money towards conservation and efficiency, including early utilization of the City's new billing system to achieve an equitable and drought-resilient result.

Morey Wolfson

Resident of Pasadena Council District 3

Former Member, Pasadena Environmental Advisory Commission

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2021 JUN -7 PM 12: 20

June 7, 2021

CITY CLERK
CITY OF PASADENA

Ken Kules' Comments on the CUP #6222
City Council June 7, 2021 Hearing, Item 12

The Agenda Report for the CUP #62322 hearing includes an "Attachment G - Responses to the Appeal Application (dated May 2021)" (Att. G). These comments submitted are with regard to that document.

Pumping Credits

Att. G describes the percent allocation of water spread using language "60 to 80% of its surface water rights that are diverted for spreading. The percentage depends on which of the City's basins are used for recharge."¹ It goes on to say that "Additionally, when the City began to take over spreading operations from the LACDPW, the Raymond Basin Management Board began using a different formula to calculate adjusted spreading from diversions and derive credits. In the last 15 years, however, the City has earned 80% credit from water diverted to the former Behner sludge ponds (Pasadena ponds 1 and 2) and 60% for water diverted to basins 1 through 12. This operation has resulted in 20 to 40% of diverted water spread for percolation remaining in the Raymond Basin."

The above description appears to generally agree with the Raymond Basin Management Board (RBMB) annual reports for the last 15 years except there appear to be irregularities in which the amount of spreading that received 80% credit frequently exceeded the spreading capacity of ponds 1 and 2. Tim Brick and I met with Tony Zampello, RBMB Executive Officer, on April 8 to discuss Raymond Basin management in general. In the course of the discussion, I pointed out that the RBMB 2003-04 Annual report included the statement that on July 9, 2003, the RBMB "Adopted Calculation of Spreading Credits in the Arroyo Seco and Millard Canyon Proposal for Consideration dated July 9, 2003 as an initial goal." I asked whether that protocol had been finally adopted by the RBMB and was told that it had not. I then asked if the RBMB had adopted any resolution or policy regarding allocation of spreading credits and he said they did not and instead relied on the spreading party to self-certify. I explained to him that Pasadena had been using the above protocols described in Att. G and explained the irregularities that I described above. His response was that he would need to have staff go back and examine the records.

The Water System and Resources Plan (Final Report dated December 2020) assumes that Pasadena will earn an 80% credit for the water diverted and says that "Assumes PWP will be able to negotiate a higher credit percentage than used for the existing spreading grounds."²

Aside from the ambiguity surrounding what the actual RBMB rules are, the Draft EIR used the Judgment rules regarding spreading of surface water rights as a shield against considering other alternatives for in-stream percolation through its over-riding project objective: "Fully divert and utilize the City's 25 cubic feet per second surface water rights while operating in a manner objectively consistent with the Raymond Basin Agreement and the 1984 Judgment."³ The implication is that all 25 cfs of water spread by the ASCP would be accounted for

¹ Att. G, p.8

² See p. Appendix F Page 1 of 6

³ ASCP DEIR, Section 3.2.3

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under the Judgment's 80% rule. If some of the water spread does not fall under the 80% rule and the RBMB does not have rules for how spreading is accounted for, the Draft EIR evaluation of alternatives is invalid.

"New Water"

PWP told the Municipal Services Committee at its October 27, 2020 meeting that "It will be further shown that water spread into the basins augments recharge of the aquifer with stream flows that would otherwise be released through the dam and lost from the basin." This statement – or any similar statement – appears nowhere in either the Draft EIR.

Att. G includes the following:⁴

The Appellants erroneously state that PWP has used only monthly data for analysis and that their analysis is more reliable and "granular" because of their use of daily values. While figures in the Draft and Final EIR use monthly displays of volumes of water that might be diverted by the proposed Project, these were based on an analysis of streamflow data reported by the USGS for the Arroyo Seco in 15-minute intervals. This data was summated for daily flow rates and displayed as monthly graphs for visualization purposes.

The monthly analysis referred to has been relied on heavily in the Final EIR to define "new water" but is described here as being derived from a more-granular analysis that we can't see for some unexplained reason and makes impeachment of the analysis impossible. This is a succinct example of the "conclusory"⁵ language used in CEQA Section 15088.5 that speaks to the requirement to recirculate the Draft EIR.

Draft EIR Shortcomings

CEQA Section 15088.5 says that the test for whether Draft EIR recirculation applies to only evaluation of the Draft EIR without regard to whether information was circulated later in the Final EIR or the appeals process

The administrative record clearly shows that PWP made an effort to evaluate hydrologic impacts on the Raymond Basin with the March 2021 analysis prepared by Dudek for PWP and incorporated into the Agenda Report prepared for the Board of Zoning Appeal hearing on the Final EIR – that was after the initial hearing on the Final EIR.⁶ This clearly passes the CEQA recirculation test of whether the Draft EIR was "so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

Additionally, Att. G includes language on p. 9 that is a "Brief Summary of Draft EIR, Section 4.5, Hydrology and Water Quality (Threshold 4.5b)." The City Council should be leery about whether that brief summary accurately characterizes the Draft EIR analysis as there are no quotes or citations to portions of the Draft.

In particular, the last paragraph of that section says "Because none of the information provided deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the

⁴ P. 12

⁵ Conclusory: consisting of or relating to a conclusion or assertion for which no supporting evidence is offered (Merriam Webster)

⁶ See Appendix C to Att. G

proposed Project or a feasible way to mitigate or avoid such an effect, recirculation is not warranted or appropriate." The actual language of the CEQA test is whether the Draft EIR was "so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

Novelo, Lilia

From: Jennifer Ho <thequickfall@gmail.com>
Sent: Monday, June 07, 2021 11:45 AM
To: PublicComment-AutoResponse
Subject: 6/7 City Council Meeting - Correspondence

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****This correspondence is being submitted in regards to agenda item: ARROYO SECO CANYON PROJECT** -**
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Dear Honorable Mayor and City Council:

Thank you for your service in your mission to deliver exemplary municipal services, and for the opportunity to provide comment about the Arroyo Seco Canyon Project.

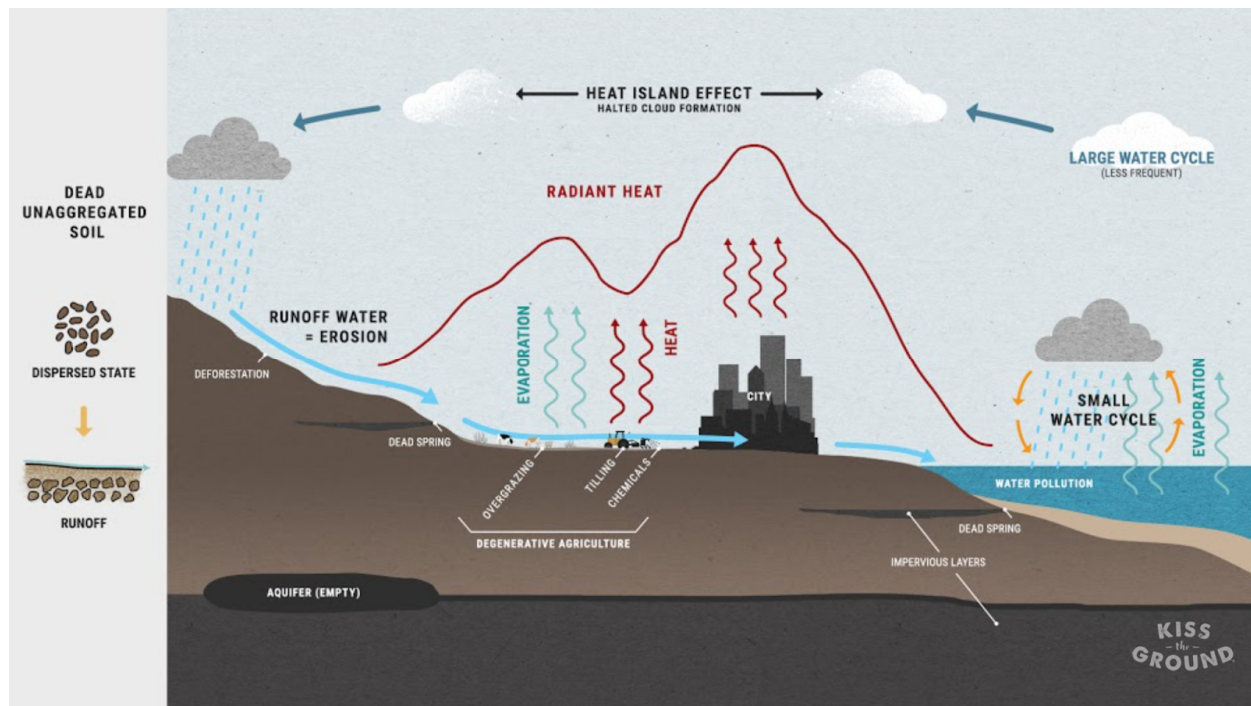
I reside by the precious gift of life and habitat that is Hahamongna Watershed Park. As someone who cares deeply about stewarding the precious resources around us, I am urging you to **stop PWP's Arroyo Seco Canyon Project (ASCP) and review the alternative considerations below.**

Continuing to alter/manipulate the landscape to add more spreading basins is a **short term, inadequate water management plan** that may be in accordance with traditional way things were done, but have proven to be insufficient and not durable, as seen by the existing and damaged "diversion & intake structures" in the Arroyo Seco. Moreover, it does not satisfy the critical need to heal the planet as a means for long term climate-resiliency. **ASCP does not provide solutions that allow for rehydration of vast landscapes and the bringing back of local, important small water cycles.**

When it comes to preserving and regenerating our valuable water resource, I am concerned about the way things have "always been done," and I also think that there is a better way. A few considerations:

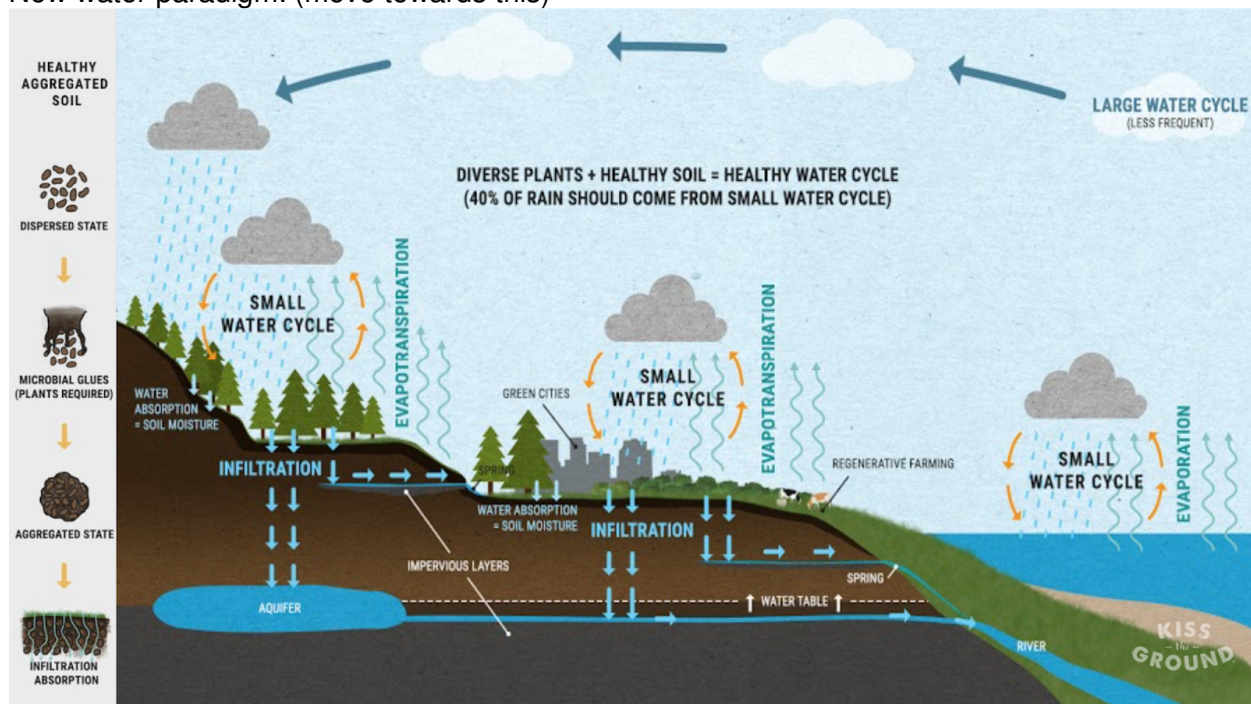
1. **Allow Indigenous and marginalized communities to lead with solutions.** Rather than a top-down approach from the PWP, work directly with those affected and let them lead - they offer a wealth of knowledge. Those closest to problems are also closest to solutions. These leaders need to be given more than a seat at the table. They should be provided enough power and resources to devise and execute solutions for their communities.
2. **Consider education and resources about [big vs. small water cycles](#) to help communities better work towards infiltrating water and building healthy soil.** Building healthy soils across rural and urban landscapes can be a big solution to helping rehydrate California's aquifers. Each 1% increase in soil organic matter helps soil hold 20,000 gallons more water per acre and improves natural groundwater recharge (1, 2). I would encourage consideration of concepts like the one below.

Current water paradigm:



In the current model, we see that the forests are cleared from the hillsides, which means **topsoil is being washed away** during rain events. We have cities with hard surfaces that are **impermeable to water**, with few plants and hot air going up, causing **heat island effect**. In these landscapes, clouds are unable to form, and we essentially have **ineffective rainfall**. On top of this, we have systems in place that **channel water out to sea as fast as possible**. Meanwhile, we pump from our quickly **depleting aquifers** without recharging them.

New water paradigm: (move towards this)



In the new model, we are regenerating the small (local) water cycles and **regenerating landscapes**. We've planted diverse native flora up in the mountain slopes, which intercept rain - some of it soaks in, which starts to **replenish aquifers**. In dense cities like Pasadena, we grow diverse plants on rooftops, switch to **permeable** road surfaces, create **ecological gardens/landscapes** throughout, and encourage **holistic water catchment systems** rather than shuttle water out as quickly as possible into the sea.

With holistic changes in land management techniques like these, we can **create an environment that allows for replenishment of small (local) water cycles and formation of abundant, cool landscapes.**

Thank you for your time and consideration. I look forward to your response and continuing the conversation about considering alternatives to ASCP.

Sincerely,
Jennifer

Sources:

- (1) <https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/organic/?cid=NRCSEPRD1367235>
- (2) https://www.energy.ca.gov/sites/default/files/2019-11/Agriculture_CCCA4-CNRA-2018-006_ADA.pdf

Martinez, Ruben

Subject: FW: Arroyo Canyon Seco Project-Support Water Settling Ponds

-----Original Message-----

From: Paul Lofthouse <lofthouse@cityofpasadena.net>
Sent: Friday, May 28, 2021 10:13 AM
To: Walker, Alison <awalker@cityofpasadena.net>
Subject: Arroyo Canyon Seco Project-Support Water Settling Ponds

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I live at : and the rear of my property looks down on to the dirt parking area that at one time was the asphalt covered JPL parking lot. It still is a dirt parking lot.

Any day that I look down into this area, it has cars parked all over the place; on the weekends it's covered.

Water settling ponds should be installed here to catch excessive water runoff instead of a parking lot. Where in a Drought....

With these settling ponds will come a plethoras of bird and animal life.

As an adjacent neighbor to this project, I want to see birds, animals and greenery; instead of a parking lot with hundreds of cars. I am sure all my adjacent neighbors feel the same.

Best regards,

Paul Lofthouse

2225 S. G Street
Pasadena, Ca.

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Martinez, Ruben

Subject: FW: Morey Wolfson's Comments on the CUP #6222
Attachments: Wolfson Comments CUP Agenda Item 12.docx

From: Morey Wolfson
Sent: Monday, June 07, 2021 3:20 PM
To: PublicComment-AutoResponse <publiccomment@cityofpasadena.net>
Subject: Morey Wolfson's Comments on the CUP #6222

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Morey Wolfson's Comments on the CUP #6222
City Council June 7, 2021 Hearing, Item 12

I urge the Council to reject the ASCP by a formal vote.
It makes no sense to inflict the environmental damage, when the return on investment is so tepid.
The \$14 million project would not have its first payback for between 21 and 33 years.
And, if arguably, there was any net gain in water, the amount is de minimis.

So why should the City do this project? I hope that is not to show that you support the Department by approving something that makes no sense. This is not a vote on whether or not you support the Department. They are doing a fine job during difficult times. They are not being judged just because they continue to support a singular misguided project.

It will be good to move the ASCP out of the way, so it no longer serves as a distraction.

The real topic is the drought and what guidance the Council sends the Department. Water conservation and efficiency are widely understood by water policy-makers to be at the top of the list. I recommend that the Council request a commitment from the Department to return to the Council within two weeks to describe a rate case or investigation process that centers on the pros and cons of how a budget based water pricing structure can meet the goal of providing an equitable means to strengthen our resiliency in the face of a drought, and to help arrest the decline of water in the Raymond Basin. The report back from the Department should also include a description of how they would intend to deploy the new \$20 million computer information and billing system for a budget pricing system.

Thank you for your service and for your consideration of this communication.

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TO: Mayor Victor Gordo and Members of the City Council

DATE: June 7, 2021

RE: Settlement Proposal regarding Arroyo Seco Canyon Project and CUP #6222

Dear Mayor Gordo and Member of the City Council:

On behalf of the appellants in the above matter, we offer a settlement resolution.

Our concerns will be resolved if the Pasadena City Council will:

1) Adopt a Motion ordering Pasadena Water & Power to:

A. Modify Mitigation Measure Bio-7 and add as a condition of approval to require that the City modify the design or operation of the diversion / weir structure to accommodate fish passage and satisfy Fish and Game Code Sections 5901 and 5937. In particular, the text should be modified as such:

~~MM-BIO-7 Prior to the commencement of earthmoving within Area 2 for the demolition of the existing diversion/weir structure, the City shall develop a Native Resident and Migratory Fish Monitoring Plan (Monitoring Plan), in consultation with CDFW. This Monitoring Plan shall set forth annual monitoring requirements to determine if native fish species or migratory fish populations are present within an approximate 3,500-foot section of the stream (about 1,500 feet upstream of the diversion/weir structure to the abandoned headworks (Area 1) and 2,000 feet downstream to the JPL Bridge at the mouth of the canyon). The Monitoring Plan will include the results of the baseline conditions for fish, which shall be conducted prior to commencement of earthwork in Area 2 within the 3,500 section of the stream using the survey methodology described in the 2010 California Salmonid Stream Habitat Restoration Manual (4th Edition). Annual survey protocols shall be established to the satisfaction of CDFW and set forth in the Monitoring Plan. If the results of the annual surveys reveal a positive presence of native fish, the Monitoring Plan shall set forth thresholds for determining the permanency of the population, and whether or not connectivity both upstream and downstream of the diversion structure is appropriate and in the best interest of the long term survival of an established native or migratory fish population, given hazards associated with stranding downstream. Until passage for steelhead is restored to the Arroyo Seco, the City shall implement a program to rescue fish between the diversion structure and the JPL Bridge. If rescue is determined to be ineffective or impractical, then The City shall modify its operations to accommodate passage. At such time as steelhead passage is restored, tThe City shall alter either the design of the diversion/weir structure, the operational methods of the diversion/weir structure, or both to accommodate fish passage as well as satisfy Fish and Game Code Sections 5901 and 5937.~~

B. Order Pasadena Water & Power to cooperate with the appellants to prepare a study that shall be

Arroyo Seco Foundation, PO Box 91622, Pasadena, CA 91109-1622

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brought forward and presented to the City Council concerning i) the natural infiltration capacity of the Arroyo Seco and Devil's Gate Reservoir for the Raymond Basin as well as possible plans and policies to stabilize and replenish the Raymond Basin.

C. Continue the item so that City Staff can draft up a modified resolution modifying the Project as such.

Thank you very much for your consideration of this matter. We hope we can reach an agreement so that we can work together constructively.

Sincerely,

A handwritten signature in black ink that reads "Tim Brick". The signature is written in a cursive, flowing style.

Managing Director
Arroyo Seco Foundation
(626) 492-2884

Iraheta, Alba

Subject: FW: Re-Arroyo Seco Canyon Project - Pasadena can do better! Invest in Nature based solutions

From: Dorothy Wong
Sent: Monday, June 7, 2021 4:56 PM
To: Gordo, Victor <vgordo@cityofpasadena.net>; Hampton, Tyron <THampton@cityofpasadena.net>
Cc: Jomsky, Mark <mjomsky@cityofpasadena.net>
Subject: Re-Arroyo Seco Canyon Project - Pasadena can do better! Invest in Nature based solutions

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Dear Mayor Gordo,

Please vote no to the Arroyo Seco Canyon Project - Pasadena can do better. The impact to the river system especially downstream will continue to degrade without care and restoration investments. This project should prioritize nature-based solutions, not expanded spreading basins that will take away water from the river system, rather please invest in ways that do not harm the ecosystem, but strengthen it. Pasadena can do better and Pasadena Water and Power can do better.

I support the Arroyo Seco Foundation's position as a long time advocate and as identified by many agencies and science the Arroyo Seco Hahamongna Watershed is a significant ecological area. Much has been lost with the Devil's Gate Project, but there is huge opportunity to recognize the ecological area and one of the last remaining treasures in the region. This is worth its weight in gold.

Please let the water flow. Invest in nature based solutions for water capture. PWD provides Altadena's water and Altadena provides water into the Arroyo Seco.

Thank you for your consideration.

Respectfully,
Dorothy Wong
Altadena Resident
Hahamongna Accountability Project

Martinez, Ruben

From: Kathy - t>
Sent: Monday, June 07, 2021 5:21 PM
To: PublicComment-AutoResponse
Subject: Agenda item 12: Arroyo Seco Canyon Project

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Dear City Council Members,

I am writing to you because I am a customer of Pasadena Water Department and have a background in Southern California water resources. I served as the groundwater program manager for Metropolitan Water District of Southern California for many years. I am very concerned about the status of the water levels in the Raymond groundwater basin. The project before you this evening seeks to restore and update the city's spreading basins in the Arroyo Seco so that the city can better capture it's pre-1914 water right of 25 cfs of flow. This is important for Pasadena to do.

Pasadena has been hampered in this effort by the Arroyo Seco Foundation which is opposed to this project. The Foundation's complaints may be accurate.

I believe that the source of the conflict is as follows. Pasadena Water Department has tended to conduct analyses relevant to recharge of the groundwater basin on its own. In response, the Foundation conducted its own analyses. I recommend to you that these analyses must be conducted by the Raymond Basin Watermaster where all parties to the judgment have an opportunity to fully understand the assumptions being made in analyses. Because the analyses for this project were conducted independently by the City, other parties do not buy into the conclusions and challenge them. This wastes everyone's time and money including that of the City.

I am requesting that the City Council, before approving this or any revised project, require the Pasadena Water Department to fully and openly cooperate with the Watermaster to review how to best recover the basin and to analyze with the Watermaster if this project will help or harm the recovery of the basin. Mr. Zampielo, the Executive Officer for both the Raymond Basin and Main San Gabriel Basin Watermasters has extensive experience and knowledge of the basins, the parties, and the judgments. Further, he is very straight forward, easy to work with and has a history of obtaining results on behalf of difficult and varied customers (producers in the basins). I recommend him to the City as the most reasonable way out of the predicament in which the City has landed.

Sincerely,

Kathleen Kunysz

06/07/2021
Item 12