

McMillan, Acquanette (Netta)

From: cityclerk
Sent: Sunday, August 30, 2026 3:27 PM
To: Iraheta, Alba; Jomsky, Mark; Robles, Sandra; Sabha, Tamer; McMillan, Acquanette (Netta); Soo, Christine
Subject: FW: City Council 8-31-2026 meeting agenda item 1: Eaton Wash Stormwater Capture Project IS/MND adoption and approval of plans

From: Ken Kules
Sent: Sunday, August 30, 2026 3:26:07 PM (UTC-08:00) Pacific Time (US & Canada)
To: cityclerk <cityclerk@cityofpasadena.net>
Subject: City Council 8-31-2026 meeting agenda item 1: Eaton Wash Stormwater Capture Project IS/MND adoption and approval of plans

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I am asking the Council to continue this item rather than adopt the MND at the August 31 meeting. I submitted a Public Records Act request today for documents that appear to be material to the City's CEQA determination but have not been made available to the public, including the July 30, 2025 Raymond Basin Management Board letter (and the information provided to the Board on which that letter was based) as well as the Regional Water Quality Control Board's comment letter.

These aren't documents I'm requesting simply because I would like additional information. The Final MND expressly relies on the RBMB letter in support of the City's position concerning several of my earlier comments, and the MND makes conclusions concerning the project's water-quality and hydrologic effects that appear to depend on information contained in technical and agency materials that have not been available for public review.

I am therefore asking the Council to defer adoption until those materials have been disclosed and the public has had a reasonable opportunity to review them. If the City concludes that the materials do not affect the MND, the Council can make that determination after the record is complete. But adopting the MND before the public has had an opportunity to review material that the City itself relies upon would unnecessarily put the Council in the position of making its CEQA determination without the benefit of a fully developed record.

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August 31, 2026

Comments on the Eaton Wash Stormwater Capture Project Final IS/MND, Response to Comments and 90% Design Drawings

The Final IS/MND (MND) Response to Comments (Agenda Report Attachment D) relies on the Craftwater April 11, 2025 Preliminary Design Report (PDR) as well as 90% Construction Drawings (Agenda Report Attachment C) to respond to comment concerns regarding operational and design information that is not discussed in the IS/MND. A review of the MND and those documents does not appear to answer the following key questions:

1. Project purpose and sizing

- If this is fundamentally a dry-weather diversion project, why is the project centered on a large underground infiltration/storage facility that appears to be designed to accommodate wet-weather diversions?
- What is the actual purpose of the 3.42-acre-foot underground storage/infiltration capacity in relation to the dry-weather diversion?
- What project objectives require this particular size and configuration, and has the City evaluated less costly or less complex alternatives that could achieve those objectives??

2. Actual dry-weather flow

- The PDR appears to use approximately 0.114–0.140 cubic feet per second (cfs) as the modeled dry-weather flow. What actual field measurements support that assumption?
- Field observations indicate dry-weather flows in Eaton Wash may be closer to 1 cfs. How does the City reconcile the difference?
- If substantially more dry-weather water is actually available, why isn't more of it proposed for diversion?
- Is the approximately 100 AF/year target a limitation imposed by the available water, or simply a limitation of the project's modeling/design assumptions?

3. Infiltration gallery design and performance

- The PDR establishes an infiltration requirement/assumption, including the approximately 0.57-acre infiltration footprint and 1.08-inch/hour infiltration rate.
- Where does the PDR establish the required physical opening area needed to achieve that infiltration?
- The 90% drawings identify an approximately 0.5-square-foot floor opening as "optional." Why is it optional?
- There are approximately 108 modules, so even one opening per module would provide only about 54 square feet of opening area. What is the minimum required number and size?
- What demonstrates that the physical gallery, as actually specified in the construction documents, can achieve the infiltration performance assumed in the PDR?

- Is the 0.57-acre area intended to represent the actual effective soil infiltration area, or merely the geometric footprint of the facility?
- If the infiltration rate assumed for the design cannot be achieved, how will the system be operated and/or modified to prevent diversion from exceeding the actual infiltration capacity?

4. Sediment and clogging

- Diverted water apparently goes directly to the infiltration gallery without a sediment-removal provision. What is the anticipated loading of fine suspended sediment, including particles less than 50 microns?
- What provisions are provided to manage fine sediment accumulation in the floor openings, the 12-inch gravel base layer, or at the aggregate/native-soil interface given that dry weather flow will be continuous?
- What reduction in infiltration capacity is expected over the project's life?
- What maintenance is required to restore infiltration capacity if clogging occurs?
- Is the PDR's infiltration assumption a long-term design rate or essentially an initial/beginning-of-life rate?

5. Downstream groundwater recharge

- How much water will the project capture and infiltrate that otherwise would have continued downstream?
- What is the net increase in groundwater recharge attributable to the project after accounting for the water no longer available downstream?
- Has that potential change in downstream recharge been adequately addressed in the environmental review?

6. Construction traffic

The Final MND/Response to Comments says the full haul route will be determined later by the contractor and Public Works (the Project/Owner), but also identifies the anticipated regional route as:

East Del Mar Boulevard → Sierra Madre Boulevard → I-210

- How will construction trucks get from the project site to East Del Mar Boulevard?
- What local streets and intersections will be used?
- How many truck trips will be generated by excavation and construction?
- Over what period and during what hours?
- What project-specific analysis supports the conclusion that construction traffic will not result in significant impacts?

- If the contractor's traffic-control/haul plan will be approved by Public Works (the Project Manager/Owner) after project approval, how were the reasonably foreseeable construction traffic impacts evaluated in the MND?
- The MND's traffic analysis appears to be based on 12,510 cubic yards (CY) of exported excavation. Based on the 90% drawings, the excavation volume appears to be approximately 27,450 CY before accounting for excavation side slopes (or shoring). What is the City's current excavation-volume estimate, and how does it compare with the quantity used in the MND traffic analysis?
- No on-site stockpile area is identified in the 90% drawings. If excavated material cannot be stockpiled on site, will all excavated material requiring disposal be exported?
- The MND does not appear to include truck trips associated with imported fill/backfill and base-course materials. What is the revised total number of construction truck trips based on the 90% design, including both exported excavation and imported materials?

7. CEQA/adequacy of environmental review

- Does the environmental document adequately analyze the project as it is actually designed and proposed to operate?
- Are the unresolved infiltration, sediment, dry-weather-flow, downstream-recharge and construction-traffic issues adequately addressed?
- If important design or operational assumptions remain unresolved, how can their environmental consequences be reliably evaluated?
- Are the potential long-term operational consequences - including declining infiltration, sediment management and maintenance - adequately addressed?
- Do the documents identified/referenced in the Final MND contain material information that should be independently reviewed before Council makes its CEQA determination?

8. City's long-term financial/Operations and Maintenance exposure

- What is the Safe Clean Water program firm commitment to fund start-up and long-term O&M costs?
- What will Pasadena's annual operating and maintenance costs not covered by a firm Safe Clean Water program firm commitment?
- What is the estimated cost for sediment removal, infiltration restoration, pumps, controls, electricity, inspections and eventual repairs/replacement?
- What happens if the facility doesn't achieve the modeled infiltration performance?
- What are the City's obligations if the underground facility requires more maintenance than anticipated?
- Given the City's long-term operating and maintenance obligations, what is the basis for accepting this particular design rather than alternatives that may provide comparable benefits with lower capital and lifecycle costs? The proposed project requires a massive underground excavation and storage structure with about 54 square feet of infiltration in the floor. Dry weather flow rates a steady and further regulated through the pumping facility, so no regulatory storage is needed. A 9-foot-diameter infiltration pond is an

example of a dramatically simpler approach to achieving infiltration comparable to the proposed project. Why wasn't an alternative of this scale and simplicity evaluated before committing to the proposed design?

- Given the City's constrained General Fund and need to seek additional revenue for essential services through increased property taxation, is it prudent for the City to accept these long-term obligations without first resolving the questions about the facility's need and performance?

Ken Kules, PE

Pasadena Resident (District 4)

McMillan, Acquanette (Netta)

From: Andrew Cobb >
Sent: Monday, August 31, 2026 3:23 PM
To: PublicComment-AutoResponse; cityclerk
Subject: Public comment to approve agenda Item 1, Eaton Wash stormwater Capture project

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Hello Pasadena City Council, My name is Andrew Cobb and I am a teacher for Learning Works Charter School, writing in support of the Eaton Wash project. The Eaton Wash project will help us restore our Groworks program to its fullest extent, where we will have students learning gardening, career, and life skills.

Our students often come to Learning Works for all sorts of reasons, often they are at risk of dropping out, have been expelled, or traditional school settings just don't work for them. We are singularly focused on making sure they graduate High School and come away with better knowledge of self and skills they can use. Our Groworks program is a key part of that, while gardening they get to see their hard work pay off slowly but surely, and get to develop skills and coping mechanisms as well. Funding this project would supercharge our gardening program, allowing even more students to participate and the benefits would extend to various science programs where students learn about California native plants, water systems, and evolutionary Biology.

Our students gain a lot of flexibility and care when they start attending Learning Works, but they do lose chances at High School sports, clubs, and the like. Our Expanded Groworks program at the Eaton Wash would help give a lot of pride to students that they can build together towards something bigger. These student's worlds are increasingly digital and we can help them interact with nature and agriculture that they wouldn't otherwise have the chance to, and introduce them to something they might truly love. The Groworks program helps us mentor our students and show them that the world is much bigger than just their neighborhood.

Here are a selection of Public comments our students wrote a few months ago about how the Groworks program at Eaton Wash would positively affect them:

"Dear Committee, my name is Brooklyn I am an eighth grade student at Learning Works. I am contacting you today to express that we would really like support for our garden, we would really also like to support the Eaton Wash project. The garden really helps me and my class relieve anger, reconnect with nature, the garden helps me feel at peace, teaches me skills and about the earth.
Thank you for the time you took reading my letter.
Sincerely, Brooklyn. "

"Dear committee, I'm Andrew an eighth grade student at Learning Works Charter School. I am writing to support the Eaton Wash project, especially the Groworks Garden. I think it can help the youth reconnect with nature and for others gardening helps them find peace. It can help students figure out skills they didn't know they have.
Thank you for your time reading, Sincerely Andrew."

"Hi Im Sam a twelfth grade student at LWCS. The garden we had at our school wasn't just a place with plants, it was where a lot of us went when everything else felt too loud or just overwhelming. Losing it felt like losing a safe space that held so many memories, from quiet lunches to moments where we could just breathe without having to worry about anything. It was something we all helped care for, so seeing it disappear made it feel like our effort and voices didn't matter. A lot of us students felt abandoned like something important was taken away without anyone really thinking about us. For a lot of us that garden was the only escape we had during the school day and now it is an empty space being used by cars. You supporting the Eaton Wash project will help repair this loss and help us with a new garden and new memories."

8/31/2026

Item 1

Dear Committee, my name is Faith. I am an eighth grade student at Learning works. I am writing this letter because we need you guys to support the Eaton Wash Project, especially the Groworks garden. We would like you to support it because we love Gardening. I like Gardening because I can take out my anger when I take the weeds out. The garden helps all of us connect with nature and gardening gives us something to do rather than being in class all day. It teaches us how to plant flowers and other types of plants.
Sincerely, Faith”

Dear Committee I am a seventh grade student from LWCS. My name is Ashley Reyes I hope your having a great day. I'm writing this letter to support the Eaton Wash project especially the Groworks garden. The reason why is because the garden helps the people feel peace or even teaches skills. Maybe another reason is because we students like to plant flowers or more things and we could help each other especially because we students like to plant it gives us peace and we can enjoy the nature. Thank you for taking your time by reading this letter, thank you once again have a great day.
Sincerley, Ashley”

Dear Committee, My name is Esther Zuniga, I am a seventh grade student at LWCS. The reason I am writing this letter is to support the Eaton Wash project especially the Groworks garden. We would like our garden back because it helps me relieve my anger and is very therapudic. The garden teaches me skills on how to plant flowers and trees. We get to make the garden look nice and it is fun to plant and grow plants and flowers. Thank you for reading my letter.
Sincerely,
Esther”

Dear Committee, My name is Dakota. I am a seventh grade student at LWCS. I really love Gardening. Me and My fellow classmates really want to start gardening more often. I really want to support the Eaton Wash project. Especially the Groworks garden. The garden really brings us together. I really want to know how to grow more things and learn more about gardening. Gardening helps teaching me skills, reconnect with nature and we just want our own garden to make it very pretty. Thank you for reading this, have a wonderful day.
Sincerely, Dakota Hannah. “

Dear Committee my name is Aniyah I am a seventh grade student at Learning Works Charter School. I am writing to you today for your help to support our school garden. This would really help our school because me and my classmates like the garden. We like it because it helps us learn stuff, helps me learn new stuff and it also helps me connect with nature and learn how to talk more and have a bond with different people. Thank you for your time and listening to my opinion.”

Dear Committee my name is Jeremiah I am reaching out to you to support my school "LWCS" garden. The garden helps us connect to nature and build relationships with my classmates and it helps me learn how to use different tools so in the future if I want I can have my own garden. Appreciate it, Jeremiah.”

Dear committee, good day. My name is Abigail I am an eighth grade student at LWCS, I am writing to you to support the Eaton Wash project especially the Groworks garden, me and my classmates would love to work in your garden and make memories there and have a great time and make it beautiful for you and us, our community especially because its my last year being an 8th grader.
Have an awesome day!
Sincerely- Abigail”

Thank you for reading our students thoughts, we hope this project gets approved as soon as possible so our students can get gardening!

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- Andrew Cobb, Learning
- Works Charter School
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