

From: William M. Paparian ·
Sent: Monday, October 19, 2026 2:13 PM
To: PublicComment-AutoResponse; cityclerk; Jomsky, Mark
Subject: Public Comment – Agenda Item 7Brookside Park Stormwater Capture ProjectOctober 20, 2026

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Dear Mayor Gordo and Members of the City Council:

As a former Mayor and Councilmember, I request that the Council not adopt the recommended finding that the Brookside Park Stormwater Capture Project is categorically exempt under CEQA Guidelines §§ 15301, 15302, 15303, 15304, and 15332, because the unusual-circumstances exception in § 15300.2(c) applies.

Staff describes the project as involving “negligible or no expansion of existing use” and “minor alterations.” Yet the facility is designed to divert up to approximately 23 cubic feet per second and capture roughly 15 acre-feet from a 1,166-acre drainage area. That scale is not consistent with the ordinary projects contemplated by Classes 1, 3, or 4.

The project’s location within the National Register-listed Pasadena Arroyo Parks and Recreation District and its connection to the historic Seco Street Drain further distinguish it from typical exempt parking-lot or utility work. There is a reasonable possibility of significant effects on historical resources, hydrology, groundwater quality, and temporary construction impacts that should be analyzed.

Parking Lot I is a primary parking resource for Rose Bowl games, concerts, and other large events. Construction lasting approximately 18 months will temporarily reduce available spaces and generate truck traffic and noise in an area already subject to intense event-related congestion. These conditions are not ordinary for the exemption classes claimed, and the staff report’s assertion of no significant traffic or noise effects does not account for them. The Rose Bowl is also a key venue for the 2028 Olympic Games; approving a major subsurface project in the primary event lot without evaluating cumulative parking, access, and construction-interface issues in the years surrounding the Games leaves a significant operational gap unaddressed.

As recently as the November 13, 2025 public information meeting, the City stated that it was preparing an Initial Study/Mitigated Negative Declaration and anticipated a 30-day public review. The current agenda instead seeks a categorical exemption at the 90-percent design stage. No public explanation has been provided for why the earlier environmental approach is no longer necessary. This shift supports a fair argument that further review is required before the Council can determine that no unusual circumstances exist.

I therefore ask the Council to decline the categorical exemption finding and direct staff to prepare an Initial Study before approving the design concept.

Thank you for your consideration.

William Paparian
Former Mayor and Councilmember
City of Pasadena

10/20/2026
Item 7

**Re: Agenda Item 7, October 20, 2026: Brookside Park Stormwater Capture Project,
Proposed CEQA Categorical Exemption**

RECEIVED
2026 OCT 20 AM 10:31

Honorable Mayor and Members of the City Council:

CITY CLERK
CITY OF PASADENA

This letter concerns only whether the Council may lawfully find this project categorically exempt. It takes no position on stormwater capture itself. The staff report relies on five exemption classes (Guidelines §§15301, 15302, 15303, 15304, and 15332) and finds that no exception applies. The City's own documents contradict that conclusion in several respects.

1. The City told the public it was preparing an IS/MND. At its November 13, 2025 public information meeting, the City's CEQA consultant presented an Initial Study/Mitigated Negative Declaration process, with 30-day public review in winter 2025/26 and Planning Commission and Council hearings in spring/summer 2026. The topics listed included Noise, Hazards, Hydrology, Biological, Cultural, and Tribal Cultural Resources. The staff report does not explain why the City abandoned that path. If an MND was contemplated, mitigation was contemplated, and an exemption cannot rest on mitigation (*Salmon Protection & Watershed Network v. County of Marin* (2004) 125 Cal.App.4th 1098). Please disclose any administrative draft IS/MND and the Psomas environmental memorandum (PDR App. F).

2. The project does not fit Classes 1, 2, or 3. The Preliminary Design Report (Black & Veatch, March 27, 2026) describes a regional system: a full-span diversion structure of up to 23 cfs, a slide-gate vault about 11 feet deep, a 10-foot-diameter pre-treatment unit with a 12-foot sump, a 0.51-acre precast gallery with 10 feet of ponding, two cartridge-filter vaults, and perimeter shoring (PDR §§4.2.1.1, 4.2.1.1.5). Excavation for the gallery alone likely exceeds 10,000 cubic yards [request grading quantities]. City materials describe the gallery as both 11 and 5.1 acre-feet, and the staff report states neither. Replacing a section of the storm drain with a diversion structure changes its purpose, so Class 2 does not apply. This is not a small structure under Class 3 or a minor alteration of an existing facility under Class 1.

3. Historic resources and tribal cultural resources (§15300.2(f); Pub. Res. Code §21084.1). The City's own project page calls the Seco Street Drain "historic." The PDR says the design limits disturbance to address CEQA historical-resource sensitivity (§2.3) and that the diversion requires partial demolition of the channel bed and walls (§4.2.1.1.1). The staff report mentions neither. Brookside Park is also part of the Arroyo Seco Natural Park, which the City's website describes as included in the National Register of Historic Places. Listed resources are historical resources under CEQA (Pub. Res. Code §§21084.1, 5024.1(d); Guidelines §15064.5), and alteration of a resource's immediate surroundings can be a substantial adverse change (§15064.5(b)). The staff report identifies no resource, boundary, or historian's evaluation. The excavation will also cut into Arroyo Seco alluvium in an area the City's website describes as home to Tongva villages, yet the report mentions no records search, Native American Heritage Commission search, or tribal consultation. AB 52 consultation (§21080.3.1) is triggered by a negative declaration or EIR, so an exemption avoids it. The City's Arroyo Seco webpage also states that Arroyo projects are subject to environmental review and links a Master EIR that the staff report never mentions (Guidelines §§15175–15179).

4. Landfill, hazards, and groundwater. The Geocon geotechnical report states the site was the Pasadena City Landfill (“Rose Bowl Dump”), that its extents are not well documented, and that landfill materials may be encountered (§§4, 5.1, 8.1.5). It states that evaluating hazardous materials was outside its scope. Its low-methane conclusion rests on the absence of nearby oil fields (§7.9) and does not evaluate landfill gas. It places historic high groundwater at less than 20 feet below grade (§6) and warns that infiltration requirements could create shallower seepage. The Council has not been told the final gallery depth or its separation from the Raymond Basin water table. Disturbing landfill waste and infiltrating stormwater beside it requires analysis, not a conclusion (§15300.2(e); Appendix G, Hazards, Hydrology).

5. Noise, vibration, and construction conflicts (Appendix G, Noise; §15332(d)). Geocon’s borings met refusal on large boulders, and the report anticipates difficult excavation, caving, and soldier-pile shoring installed by drilling or vibration, with risk of settlement and damage to nearby improvements and with vibration monitoring “not the responsibility of the Geotechnical Engineer” (§§1, 8.1.7, 8.17). The PDR assumes about 10 feet of perimeter shoring, requires relocating or protecting power and telecom lines, and notes that the north end of Lot I hosts Rose Parade float construction (§§3.1, 4.2.1.1.5, 4.2.2.2). Receptors include Chandler School, Kidspace, the aquatic center, tennis courts, Jackie Robinson Field, and homes. No noise or vibration study exists, and construction is expected to last months, per PDR Table 8-2.

6. Trees, habitat, and Arroyo flows (§15332(c); §15304). Class 4 excludes removal of healthy, mature, scenic trees. The staff report counts nine sycamores for removal and relies on the 19-inch threshold in Municipal Code Chapter 8.52. The PDR counts 14 trees in the work limit (12 sycamores and 2 coast live oaks) and states that all surveyed trees are protected “public” trees under that chapter (§3.2). It also acknowledges potential oak-woodland resources and nesting birds requiring surveys and buffers (§2.3). Class 32 requires that the site have no habitat value, which no study addresses. The PDR states the diversion captures 100% of flows to 23 cfs, including all dry-weather flows (§4.2.1.1.1), yet contains no analysis of the habitat below the Colorado Street Bridge and 210 underpass that depends on that inflow.

7. Odor (Appendix G, Air Quality (d)). The PDR prescribes vents on the gallery (§4.2.1.1.5) and a sump that accumulates trash and sediment, and the project may expose landfill materials. No odor analysis exists, and the public has not been told how it would be controlled.

8. Cumulative impacts, unusual circumstances, and deferral (§15300.2(b), (c); *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086). Staff states there are “no features that distinguish the project” without analysis. A former landfill, boulder-laden alluvium, a historic drain slated for demolition, a National Register park landscape, and a flow diversion above one of the last natural Arroyo reaches are distinguishing features. The PDR itself notes possible coordination with Olympics-related Rose Bowl Aquatics Center improvements, and the project is one of several Arroyo diversions (with the Arroyo Seco Canyon and Arroyo Water Reuse projects). The staff report says technical review and permitting will continue, and the PDR lists environmental review and permitting as next steps, but an exemption must rest on evidence available now. A common-sense exemption requires certainty that no significant effect is possible (*Muzzy Ranch Co. v. Solano County Airport Land Use Commission* (2007) 41 Cal.4th 372).

Requests. I respectfully ask the Council to:

1. Decline to adopt the exemption.
2. Direct completion of the IS/MND the City announced in November 2025, or an EIR if warranted.
3. Require a historic resources evaluation, a cultural and tribal resources assessment, a Phase I/II site assessment with landfill gas evaluation, noise and vibration studies, a groundwater separation analysis, a biological assessment of the Arroyo reach below the diversion, and a cumulative flow analysis.
4. Require staff to explain the project's consistency with the Arroyo Seco Master Plans and Master EIR.
5. If the Council will not decline, continue the item so the public can review Attachment A and the underlying studies.

This letter and all documents and testimony referenced in it are submitted to preserve all issues for the record (Pub. Res. Code §21177).

Thank you,

Lauren Siegel

Resident of District 1

McMillan, Acquanette (Netta)

From: Ken Kules
Sent: Tuesday, October 20, 2026 10:36 AM
To: PublicComment-AutoResponse; Gordo, Victor; Madison, Steve; Masuda, Gene; Hampton, Tyron; Cole, Rick; Jones, Justin; Lyon, Jason; Rivas, Jessica
Cc: Hawkesworth, Matthew; de Vinck, Greg
Subject: Brookside Park Stormwater Capture Project Categorical Exemption from CEQA Requirements (10-20-2026 meeting, Item 7)
Attachments: Ken Kules' Comments on Brookside Park CEQA Exemption.pdf

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My detailed comments regarding the proposed categorical CEQA exemption determination for the Brookside Park Stormwater Capture Project, scheduled for consideration at tonight's meeting are attached.

My primary concern is that the staff report and Attachment A characterize the project largely as rehabilitation of an existing parking lot, while giving insufficient consideration to the scale and function of the proposed underground stormwater capture and infiltration facility.

The 90-percent design plans in Attachment B show an underground gallery with a reported footprint of approximately 0.57 acre and a storage capacity of 6.06 acre-feet - approximately 1.98 million gallons. The project also includes diversion and treatment facilities and a new 30-inch pipeline connecting the existing Seco Street Drain to the gallery. Designed to capture runoff from approximately 1,166 acres, this is a substantial new stormwater capture and groundwater recharge system, not simply a parking lot improvement.

Although the City has provided design plans, the staff report does not identify supporting technical documentation sufficient to substantiate its conclusions that the project qualifies for all five cited categorical exemptions or that none of the exceptions under CEQA Guidelines Section 15300.2 applies. In particular, the report does not adequately explain how the scale and function of the new infiltration facility are consistent with the claimed exemptions or provide a sufficiently documented basis for its conclusions regarding water quality, unusual circumstances, and potential effects on the historic district.

I respectfully request that the Council **defer approval of the categorical exemption determination** until the City provides an adequate, project-specific analysis of the applicable exemptions and exceptions, supported by the relevant technical documentation. If the City cannot substantiate the exemption determination, it should undertake the appropriate level of CEQA review before proceeding.

I ask that these comments be included in the administrative record and considered before the Council acts on this item.

10/20/2026
Item 7

Comments on the Proposed Brookside Park Stormwater Capture Project Categorical Exemption Pursuant To the California Environmental Quality Act

I respectfully request that the City Council decline to approve the proposed categorical exemption determination for the Brookside Park Stormwater Capture Project as currently presented in the October 20, 2026 staff report and Attachment A.

The proposed project description emphasizes rehabilitation, resurfacing, restriping, and restoration of an existing public parking lot. However, the project also includes construction of a substantial underground stormwater capture and infiltration facility, together with diversion structures, pretreatment and filtration systems, a new 30-inch reinforced concrete pipeline, and associated infrastructure intended to divert runoff from the Seco Street Drain and recharge the Raymond Basin aquifer.

Based on the project's engineering characteristics, including a reported infiltration gallery footprint of approximately 0.57 acre and storage capacity of 6.06 acre-feet, the underground facility is a major component of the project and warrants independent consideration in determining whether the project qualifies for the cited categorical exemptions. The storage capacity alone represents approximately 1.98 million gallons.

The staff report does not adequately describe the dimensions, storage capacity, excavation requirements, operational characteristics, or potential environmental consequences of this facility. Instead, it repeatedly characterizes the project as an improvement to existing facilities that will result in negligible or no expansion of existing use.

That characterization does not, by itself, establish that the project is categorically exempt from the California Environmental Quality Act (CEQA).

I request that the City provide a complete, project-specific analysis of the applicability of each claimed exemption and the exceptions under CEQA Guidelines Section 15300.2 before approving the environmental determination.

1. The project description does not adequately disclose the scale and nature of the principal stormwater infrastructure

Attachment A describes the project as consisting primarily of rehabilitation, resurfacing, restriping, and restoration of an existing public parking facility. The underground infiltration gallery and associated stormwater infrastructure are characterized as ancillary or appurtenant improvements.

This description does not adequately communicate the nature and scale of the proposed construction as depicted in Attachment B.

The project is designed to capture and treat runoff from approximately 1,166 acres of watershed. It includes diversion of dry-weather and stormwater flows from the Seco Street Drain into a new subsurface capture and infiltration facility, with a reported storage capacity of 6.06 acre-feet. It

also includes a new 30-inch reinforced concrete pipeline, pretreatment and filtration infrastructure, monitoring facilities, and associated surface improvements.

These are not merely pavement repairs or routine modifications to an existing parking facility. They constitute a new, integrated stormwater capture and groundwater recharge system.

The distinction matters because categorical exemptions apply to defined classes of projects, not simply to projects located within previously developed areas. The fact that a facility is constructed beneath an existing parking lot does not establish that its construction is minor, that its environmental effects are negligible, or that it falls within every exemption cited by the City.

Before making a determination, the City should disclose at least the following project characteristics:

- The infiltration gallery's verified footprint, depth, configuration, and total storage capacity.
- The excavation dimensions, anticipated excavation volumes, construction methods, and duration of excavation.
- The locations, dimensions, and functions of the diversion structures, pretreatment facilities, filtration systems, and connecting pipelines.
- The design flows, anticipated frequency of operation, and relationship between dry-weather diversions, stormwater capture, and infiltration.
- The expected range of storm events and runoff volumes the facility is designed to manage.
- The anticipated changes to existing stormwater conveyance, drainage, and infiltration patterns.
- The potential effects on groundwater quality, subsurface conditions, existing trees, and the historic setting of Brookside Park.
- The basis for concluding that the new infrastructure will have no significant environmental effects.

The reported footprint and storage capacity should be confirmed against the current 90-percent design plans and expressly incorporated into the project description used for the CEQA determination.

A categorical exemption should not be approved on the basis of a project description that understates or obscures the scale and function of a major project component.

2. Class 1: Existing Facilities - CEQA Guidelines Section 15301

The staff report relies on Section 15301 because the project involves improvements to existing public facilities and infrastructure, with negligible or no expansion of existing use.

However, the report does not adequately distinguish between maintenance or minor alterations to existing facilities and construction of a new stormwater capture and infiltration system.

The proposed infiltration gallery is not simply a replacement for existing parking lot pavement. It introduces substantial new subsurface infrastructure designed to capture, treat, store, and infiltrate stormwater. The project also includes new diversion structures, filtration facilities, and a 30-inch pipeline connecting the existing Seco Street Drain to the proposed gallery.

The staff report asserts that the project will not increase the capacity or intensity of use of the existing storm drainage system. Yet it does not explain how that assertion relates to the project's stated purpose of increasing stormwater capture and groundwater recharge.

The City should distinguish between the capacity of the existing storm drain to convey runoff and the new capacity to divert, capture, store, treat, and infiltrate that runoff. These are different functions.

Even if the project does not enlarge the existing parking lot or increase its parking capacity, it may materially change the function of the stormwater infrastructure serving the site.

The relevant question is not simply whether the parking lot will continue to function as a parking lot. It is whether the complete project, including the new stormwater facilities, falls within the scope of Section 15301.

The City should identify the specific existing facilities being maintained, repaired, or modified and explain why the new infiltration gallery and associated infrastructure qualify as minor alterations to those facilities rather than substantial new facilities requiring separate environmental consideration.

Absent that analysis, the applicability of the Class 1 exemption has not been adequately demonstrated.

3. Class 2: Replacement or Reconstruction - CEQA Guidelines Section 15302

The staff report invokes Section 15302 for reconstruction of impacted portions of the parking lot, replacement of pavement and landscaping, reconstruction of drainage-related infrastructure, and connections to the existing Seco Street Drain.

However, Section 15302 concerns replacement or reconstruction of existing structures and facilities where the replacement or reconstruction serves substantially the same purpose and capacity as the structure replaced.

The proposed infiltration gallery appears to be a new facility rather than a replacement for an existing infiltration gallery of comparable capacity. The staff report does not identify an existing underground capture and infiltration facility that will be replaced by the proposed gallery.

Nor does the report establish that the new diversion, treatment, storage, and infiltration infrastructure merely replaces existing facilities serving substantially the same purpose and capacity.

The City should identify which project components are actual replacements or reconstructions and which are new construction. It should then explain the factual basis for applying Section 15302 to each component.

Reconstruction of existing pavement may qualify under this exemption. That does not establish that the entire stormwater capture project qualifies.

The Council should not rely on an exemption applicable to replacement and reconstruction of existing facilities to exempt new infrastructure without a reasoned, component-specific explanation.

4. Class 3: New Construction or Conversion of Small Structures - CEQA Guidelines Section 15303

The proposed project includes an underground infiltration gallery with a reported storage capacity of 6.06 acre-feet, in addition to diversion structures, pretreatment vaults, filtration systems, monitoring manholes, and a new 30-inch pipeline.

A storage capacity of 6.06 acre-feet is approximately 1.98 million gallons. This is a substantial stormwater storage volume, even though the facility is located below grade.

The staff report does not provide the dimensions of the gallery or explain how a facility of this scale qualifies as a small structure under Section 15303.

Nor does the report explain whether the exemption is intended to apply to the gallery itself, the individual ancillary structures, or the entire integrated stormwater system.

The underground location of a structure does not establish that it is small. Similarly, describing a structure as ancillary to an existing parking facility does not resolve whether it falls within the class of new construction contemplated by the exemption.

The City should provide the gallery's actual dimensions and engineering specifications, identify the particular provisions of Section 15303 on which it relies, and explain why the facility's scale and function are consistent with that exemption.

If the City relies on Section 15303 for individual appurtenant structures, it should explain why that exemption also supports the determination for the complete project, including the integrated gallery, diversion system, and connecting pipeline.

The Council should not accept the Class 3 exemption solely on the basis of the report's conclusory characterization of these facilities as being of limited size and scale.

5. Class 4: Minor Alterations to Land - CEQA Guidelines Section 15304

The staff report relies on Section 15304 because the project involves grading, bioretention facilities, permeable pavement, landscaping, and construction within previously disturbed areas.

However, the project also requires excavation and construction of an underground infiltration gallery with a reported storage capacity of 6.06 acre-feet, along with associated stormwater infrastructure. The project will require removal of nine existing trees to accommodate construction.

These activities should not automatically be characterized as minor alterations to land merely because the surface will ultimately be restored to a paved parking lot.

The relevant analysis must address the nature and extent of the physical alteration, including the excavation, subsurface construction, effects on existing trees and landscaping, and potential changes to drainage and infiltration.

The staff report also emphasizes that the nine trees proposed for removal do not meet the City's definition of mature trees under Pasadena Municipal Code Chapter 8.52.

That municipal definition does not, by itself, resolve whether the proposed removals or associated construction implicate CEQA's exception for removal of healthy, mature, scenic trees. The applicable CEQA standard and the particular circumstances of the trees must be considered independently.

The City should provide the arborist's assessment, identify the trees and their condition, explain the basis for determining that the relevant CEQA exception does not apply, and disclose the proposed replacement or mitigation measures, if any.

More fundamentally, the City should explain why excavation and construction of the proposed infiltration gallery constitute minor alterations to land within the meaning of Section 15304, taking into account the facility's actual dimensions, storage capacity, and construction requirements.

The fact that the surface will be repaved following construction does not, standing alone, establish that the subsurface alteration is minor.

6. Class 32: In-Fill Development Projects - CEQA Guidelines Section 15332

The City also relies on Section 15332, which establishes specific eligibility criteria for qualifying in-fill development projects.

The report states that the project site is less than five acres, previously developed, substantially surrounded by urban uses, adequately served by existing utilities and public services, and consistent with applicable land use regulations.

However, satisfying the location and development characteristics of an in-fill site does not eliminate the need to demonstrate compliance with all the exemption's requirements.

Section 15332 requires, among other things, that the project be consistent with the applicable general plan and zoning designations, occur on a site of five acres or less substantially

surrounded by urban uses, have no value as habitat for endangered, rare, or threatened species, and be adequately served by all required utilities and public services. It also requires a determination that the project would not result in significant effects relating to traffic, noise, air quality, or water quality.

The staff report does not provide a sufficiently detailed evidentiary basis for several of these conclusions.

A. The project must be evaluated as a complete development proposal

The City characterizes the site as an existing parking lot and describes the stormwater infrastructure as ancillary improvements.

However, the project is not limited to resurfacing or restriping. Its principal objectives include capturing runoff from a 1,166-acre watershed, treating stormwater, and increasing groundwater recharge through a new underground facility.

The City should explain how the project, considered as a whole, satisfies Section 15332. The fact that it is located on a developed site is relevant, but it is not a substitute for analyzing the complete project.

B. The conclusion regarding water quality requires supporting evidence

The project will intentionally divert dry-weather and stormwater flows from the Seco Street Drain and route them through pretreatment and filtration facilities into a subsurface infiltration gallery.

Although the stated objectives include improving water quality and protecting groundwater, those objectives do not, by themselves, demonstrate that the project cannot cause significant water-quality effects.

The City should disclose the technical basis for its conclusion, including the proposed treatment processes, anticipated influent water quality, infiltration design, and the basis for determining that the captured water can be infiltrated without significant adverse effects on groundwater quality.

The analysis should address the range of water-quality conditions reasonably anticipated for the diverted flows and the design assumptions on which the proposed system depends.

The Council should not treat the project's intended environmental benefits as proof that all potentially significant environmental effects have been ruled out.

C. The historic setting must be considered in evaluating the complete project

The project is located within the Pasadena Arroyo Parks and Recreation District, which the staff report identifies as listed in the National Register of Historic Places.

The City characterizes Parking Lot I as a noncontributing feature and concludes that the project will not adversely affect the historic district.

However, the noncontributing status of the parking lot does not, by itself, establish that every proposed alteration within the site is incapable of adversely affecting the historic resource or its setting.

The City should identify the specific findings of the Historic Built Environment Impacts Assessment that support its conclusion, including the assessment of construction activities, tree removal, landscaping changes, and the completed project's compatibility with the historic district.

The analysis should also address whether any exception to the categorical exemptions applies, as discussed below.

D. The absence of significant effects must be supported by the administrative record

Attachment A repeatedly states that the project will not result in significant effects relating to traffic, noise, air quality, or water quality.

However, the executive summary does not identify the evidence supporting each of these conclusions or explain how the effects of the complete project were evaluated.

The project is expected to involve approximately 18 months of construction, including substantial subsurface work, and the staff report indicates that the design is currently at the 90-percent stage.

The City should identify the technical analyses and supporting evidence that establish compliance with the applicable Class 32 criteria. It should also explain how those conclusions account for construction of the infiltration gallery and its associated infrastructure, rather than relying primarily on the fact that the parking lot will retain its existing use.

The Council should not approve the Class 32 exemption without a clear, project-specific demonstration that all applicable criteria have been satisfied.

7. The unusual-circumstances exception under CEQA Guidelines Section 15300.2(c) requires meaningful consideration

The staff report concludes that there is no substantial evidence that the project would result in a significant environmental effect due to unusual circumstances.

That conclusion is not adequately explained.

In *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, the California Supreme Court explained that the unusual-circumstances exception requires consideration of whether a project has circumstances that distinguish it from others in the exempt class and

whether there is a reasonable possibility of a significant environmental effect due to those circumstances.

The Court also explained that a project feature such as its size or location may establish an unusual circumstance, and that evidence of potentially significant environmental effects may be relevant to that determination.

Here, several characteristics warrant examination:

1. The project includes a new underground infiltration gallery with a reported storage capacity of 6.06 acre-feet.
2. The facility is designed to capture and treat runoff from approximately 1,166 acres of watershed.
3. The project introduces new diversion, pretreatment, filtration, and infiltration infrastructure connected to an existing storm drain.
4. Construction requires removal of nine existing trees and substantial subsurface work within a historic park setting.
5. The project is intended to change how runoff is captured, treated, and infiltrated to recharge the Raymond Basin aquifer.

These characteristics distinguish the proposed project from routine parking lot rehabilitation and warrant a reasoned assessment of whether the complete project falls within the ordinary scope of the claimed exemptions.

The argument is not that a project must be subject to environmental review simply because it is large or involves underground construction. Rather, the City must assess the actual project against the scope of the exemption invoked and determine whether unusual circumstances create a reasonable possibility of significant environmental effects.

The staff report's generalized conclusion that none of the exceptions applies does not adequately demonstrate that this analysis has been performed.

The Council should require the City to identify the evidence considered, explain how the unusual-circumstances exception was evaluated, and address any evidence in the administrative record that could support a different conclusion.

8. The historic-resource exception under Section 15300.2(f) requires separate consideration

CEQA Guidelines Section 15300.2(f) provides that a categorical exemption shall not be used where a project may adversely affect a historical resource.

The staff report acknowledges that the project site is within the Pasadena Arroyo Parks and Recreation District, a National Register-listed historic district. It relies on a Historic Built Environment Impacts Assessment and identifies the parking lot as a noncontributing feature.

However, identifying the parking lot as noncontributing is not necessarily equivalent to establishing that the project cannot adversely affect a historical resource.

The proposed work includes subsurface construction, tree removal, replacement landscaping, and other alterations within the historic district. The City should explain whether and how these activities were evaluated for potential effects on the district's historical significance, character, and setting.

The Council should also be provided with the relevant findings of the historic assessment, rather than being asked to rely solely on the summary conclusion in Attachment A.

If the administrative record contains evidence that the project may adversely affect a historical resource, the City must address that evidence before relying on a categorical exemption.

9. The City's reliance on multiple exemptions does not resolve the underlying issues

The staff report invokes five categorical exemptions: Classes 1, 2, 3, 4, and 32.

However, citing multiple exemption classes does not establish that the project qualifies for any particular exemption or that an exception does not apply.

Each exemption has its own scope and eligibility requirements. A component that qualifies as reconstruction of existing pavement does not necessarily establish that the new infiltration gallery qualifies as a small structure, a minor alteration to land, or a minor alteration to an existing facility.

Likewise, the fact that a project is located within an existing developed site does not eliminate the need to consider the nature and scale of new infrastructure constructed there.

The City should identify which exemption applies to each major project component, explain why the complete project satisfies the exemption requirements, and separately address the applicable exceptions under Section 15300.2.

If the City concludes that one exemption applies to the entire project, it should explain why that exemption covers the complete project and why none of the applicable exceptions precludes its use.

10. The appropriate course is to defer the categorical exemption determination pending adequate analysis

The project may offer meaningful water-quality and groundwater-recharge benefits. Those benefits, however, do not establish that the project is exempt from CEQA.

The question before the Council is whether the complete project, as proposed, falls within the categorical exemptions cited by the City and whether the record supports the conclusion that none of the exceptions applies.

The present staff report does not adequately establish that conclusion. In particular, it does not sufficiently distinguish between rehabilitation of the existing parking lot and construction of the new underground stormwater capture and infiltration system.

I therefore request that the City Council:

1. **Decline to approve the categorical exemption determination as currently presented.**
2. **Require a complete and accurate project description** identifying the infiltration gallery's dimensions, footprint, depth, storage capacity, excavation requirements, and associated infrastructure, consistent with the current project design.
3. **Require a component-specific exemption analysis** explaining why the gallery, diversion structures, pretreatment and filtration systems, connecting pipeline, tree removal, and other major project components qualify for each exemption invoked by the City.
4. **Require a reasoned analysis of the exceptions under CEQA Guidelines Section 15300.2**, particularly the unusual-circumstances exception and the historical-resources exception.
5. **Make the technical analyses and supporting documents available for public review** so that the Council and the public can evaluate the factual basis for the proposed determination.
6. **Direct staff to undertake the appropriate level of CEQA review** if the City cannot substantiate the categorical exemption determination. This should include preparation of an initial study if warranted, followed by the appropriate CEQA document based on the evidence and applicable legal standards.

The City should not approve the proposed categorical exemption determination simply because the project is located beneath an existing parking lot or because the parking lot will continue to serve its existing function. The environmental determination must address the actual scope, scale, and reasonably foreseeable effects of the complete project.

Ken Kules

Pasadena Resident

McMillan, Acquanette (Netta)

From: Jessica Richards
Sent: Tuesday, October 20, 2026 11:32 AM
To: PublicComment-AutoResponse
Cc: cityclerk; Cole, Rick; Jomsky, Mark
Subject: Brookside storm water project public comment

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Hello,

Briefly, I'd like to outline a few concerns with this project:

1. An initial study has not been conducted. Given the disruption to one of the most popular venues in Pasadena, it's crucial all information and analysis is gathered first to ensure the intended outcome. Skipping steps is rarely wise.
2. Given the proximity to the Arroyo and potential impact to this historic and protected area, a full CEQA review is appropriate and necessary.
3. The runoff that previously ended up in the Arroyo will be now captured. Downstream what is the impact of less water to the flora and fauna? The project must be viewed in the context of the entire Arroyo system not just the isolated area.

Prior to approval, I strongly urge council to request this additional information in which to inform a final decision.

Jessica Richards, MS, MSW, LCSW
Commissioner UFAC
President BHNA
(Writing in my individual capacity)

McMillan, Acquanette (Netta)

From: Egor Chumak
Sent: Tuesday, October 20, 2026 11:32 AM
To: PublicComment-AutoResponse
Subject: Agenda Item 7 for October 20, 2026: Brookside Park Stormwater Capture Project

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Mr. Mayor and Members of the Council,

Please adopt the recommendations for the exemption of the Brookside Park Stormwater project from CEQA. I am writing in rebuttal to points raised by the opposition.

Firstly, why should my opinion matter? I have attended numerous in-person presentations and community outreach meetings for this project. I help run a 501c3 non-profit, focused on community-organized cleanups of neighborhoods. One of the main projects for us has been consistent clean-up of the Los Angeles River at Sepulveda Basin Park. Yes, it is not in Pasadena, but trash is trash, and pollution is pollution. Trash does not care about lines drawn on the map. I understand first-hand the effects of generational pollution on the water and soil. I have experienced the hurdles and challenges trying to make changes to the infrastructure in order to improve the quality of water. I have encountered dealing with 7+ agencies and jurisdictions, from the Army Corps of Engineers to LA Parks and Recs.

I have attended Arroyo Seco cleanup twice (in 2025 and 2026), organized by DayOne and the City of Pasadena. Strangely, Mr. Paparian and Ms. Lauren Siegel were NOT there.

I live near the Rose Bowl, and witness water pollution constantly. Once your eye is trained (After 5+ years of doing hundreds of community clean-ups), you cannot see the trash and pollution. It is a lot easier to live an ignorant life, sweep the problem under the rug, and pass it on to the next generation, as we are witnessing on the federal level right now.

This project will have cascading positive effects. The water, soil, and the Arroyo will be cleaner. The city will not get penalized for delaying groundwater infrastructure projects. EVERY further Arroyo Seco stormwater project downstream will start with improved water quality. Therefore, further projects would not have to be large in scale, price, and disruption.

In Mr. Paparian's letter, he writes that the project diverts water and captures water but fails to mention that CLEANED water is then returned to the Arroyo Seco. Next, he states, "the project's location within the National Register-listed Pasadena Arroyo Parks and Recreation District", yet he conveniently avoids stating that the project is limited to a portion of a parking lot. It is not in a park and not in a play area.

Further, "There is a reasonable possibility of significant effects on historical resources, hydrology, groundwater quality, and temporary construction impacts that should be analyzed". The construction is temporary, yet the "significant effects" on water and soil are long-lasting and, more importantly, POSITIVE. The project literally cleans water from both garbage, natural debris, and bacteria and RETURNS it back to the Arroyo.

Next paragraph states, "Parking Lot I is a primary parking resource for Rose Bowl games, concerts, and other large events...". There are 3 points to raise here: 1) Anybody who has been to the Rose Bowl area frequently would know that Rose Bowl, for major events, heavily utilizes parking lots F, K, 5A, the green area in front of the

main entrance, and Brookside Park. Councilmember Hampton can definitely attest to that. 2) Only a small portion of Parking Lot I would be closed, not the whole thing. 3) "The Rose Bowl is also a key venue for the 2028 Olympic Games." Mr. Paparian would know that no construction will begin until AFTER the 28 Olympics, if he read the project.

"Construction lasting approximately 18 months". I'll give him that. Should it be done faster? Absolutely. Maybe it would be if we did not waste an enormous amount of money on consulting and endless studies to delay the project.

If it were up to the opposition, we would still be doing CEQA analysis on the "reasonable possibility of significant effects" of CO2 (carbon dioxide) production by construction workers.

We would not have to do this project and have these effects if the City of Pasadena had done stormwater projects back in 1995-1997 when Mr. Paparian was the mayor, and everything was cheaper and faster. "The good old times," as people like him often say. Yet, the trash and pollution from 1995 is still here in the Arroyo, causing generational damage.

As far as Ms. Siegel's points, "the Seco Street Drain is 'historic'". For essential city infrastructure such as pipes, "Historic" is NOT a compliment. By the same measure, we have "historic" pipes busting all over the greater Los Angeles Area. We have "historic" trash stuck and embedded all over our parks, drains, and Arroyo Seco. My assumption Councilmember Jones would probably agree with that, given his professional experience as an engineer and with PWP.

Strangely again, when Ms Siegel was attending an in-person project outreach event on April 2nd, 2025, she had no issues [listed in her letter] mentioned there, even though project managers, administrators, and experts were there to answer any concerns. I remember attendees there having an issue with this project NOT being big enough and not capturing 100% of the stormwater from the Seco Drain. An issue addressed and explained [using an 80/20 rule analogy] by the project staff and project administrator, Ms. Dawn Petschauer.

Lastly, without making this longer, any of her further points can be summarized as "temporary disruptions for greater permanent positive effects." According to the people with such a will for inaction: Landfill hazard, odor, trees, and habitat are not okay to create TEMPORARILY during construction. However, PERMANENT generational landfill hazard, persistent bacteria odor, poisoning of trees, and habitat are okay as long as it was like this before. I do not support that point of view and urge the council to approve staff recommendations.

Respectfully,
Egor Chumak
Resident of District 1.