



YSABEL JURADO
L.A. CITY COUNCIL MEMBER
DISTRICT 14

July 31, 2026

Christina Monde, P.E.
City of Pasadena Department of Public Works
100 North Garfield Avenue, Suite N306
Pasadena, CA 91101

SUBJECT: Arroyo Seco Water Reuse Project Draft Environmental Impact Report

Dear Ms. Monde,

I am writing this letter to express my strong opposition to the Arroyo Seco Water Reuse Project (Project) and to urge that the City of Pasadena vote not to certify the Draft Environmental Impact Report (DEIR). I recognize the importance of promoting greater stormwater capture, regional water supply reliability, and improving water quality; and appreciate the effort undertaken by the City of Pasadena in preparing the DEIR, however I remain deeply concerned that the DEIR does not adequately disclose, analyze, or propose sufficient mitigation measures for several significant impacts associated with the proposed project that our community members and local Tribal governments have made clear to our office and the general public.

The draft EIR identified mitigation measures intended to reduce impacts associated with aesthetics, air quality, biological resources, cultural and paleontological resources, greenhouse gas emissions, hydrology and water quality, land use and planning, noise, public services and recreation, Tribal cultural resources, and wildfire. Relative to aesthetics, air quality, and land use and planning, it was deemed the project would have no impact and there are no mitigation measures required. Relative to greenhouse gas emissions, hydrology and water quality, and wildlife, the impacts were determined to be less than significant and not requiring any additional mitigation. For impacts to biological resources, cultural and paleontological resources, noise, public services and recreation, and Tribal cultural resources, the DEIR identified that "potentially

significant” impacts would be reduced to less than significant levels through the implementation of select mitigation measures.

The Arroyo Seco is a significant ecological corridor, public recreation resource, and a place of profound cultural importance to local Tribal communities; particularly to the San Pascual neighboring community who reside within my district. The proposed construction would introduce major hydraulic infrastructure that would permanently alter the area, and has resulted in widespread opposition from the local community and Tribal representatives. Though the DEIR concludes that the Project would not result in “any significant, unavoidable environmental impacts,” substantial questions remain regarding its unmitigable impacts on the resources the biological resources, Tribal Cultural Resources, and access to public recreation.

The DEIR acknowledges that the Project area is culturally sensitive relative to local Tribes, the Gabrieleño Band of Mission Indians - Kizh Nation, have long stated that this site is on sacred land, and that the Project would result in irreparable harm that cannot be so simply remediated. The DEIR states that consultation requirements under AB 52 have been fully satisfied and falsely assumes consulted tribal communities “reached mutual agreement regarding the mitigation measures.” In fact, the Gabrieleño Band of Mission Indians - Kizh Nation have publicly stated that they were continually excluded from the decision-making without an adequate process for public engagement and have requested full avoidance of the Project. Given the documented disagreement regarding the adequacy and completeness of their engagement with the Project it is clear that the DEIR is insufficient in responding to the concerns raised by Tribal communities. After the Notice of Preparation for the Proposed Arroyo Seco Water Reuse Project was sent to the Gabrieleño Band of Mission Indians - Kizh Nation, the tribe responded requesting “meaningful engagement” and that the project be “reassessed with full tribal consultation during the environmental review.”

The DEIR also identifies potentially significant impacts associated with the removal of many centuries-old mature trees and native vegetation, disturbance of the riparian habitat and wildlife movement within the Arroyo Seco corridor, and impacts to nesting birds and bats. These impacts are proposed to be mitigated primarily through replacement planting, pre-construction surveys, and on-site biological monitoring, which though important, do not adequately compensate for the loss of the mature canopy, which provide habitat, shade, and carbon sequestration, that cannot be so

quickly replaced by new trees. Our community stakeholders have repeatedly raised significant concerns that the Project would permanently alter the habitat of the Arroyo Seco, without sufficient mitigation measures to minimize mature tree removal and the ecosystem loss associated with it.

Concerns further remain as to the impact of the removal of a native tree canopy on light and glare for the surrounding community, given that the canopy currently supports in obstructing light emitted from artificial lighting sources and reducing light polluting on the whole. Though the DEIR identifies that there would be no impact, and no mitigation is required regarding light and glare due to no new sources of light or glare with project implementation, the removal of mature oak trees at the San Pascual site would undoubtedly cause an impact. This impact is unassessed in the DEIR, and therefore the analysis of the impacts to light and glare is not sufficiently addressed.

The DEIR describes a small treatment of diverted stormwater for irrigation reuse via an off-site water harvester located within an existing maintenance yard at the Arroyo Seco Golf Course to offset potable water demand therein, but it does not clearly disclose whether runoff from the golf course is recaptured or remediated. It is therefore concerning if the runoff were to re-enter the Arroyo Seco untreated—and whether nutrients, pesticides, herbicides, and other sediments mobilized from golf course operations would offset anticipated water quality benefits. The DEIR should clarify the direction of resultant irrigation runoff from the golf course, and the potential discharge of contaminated water from the golf course into the Arroyo Seco undermines the project's original goals of rehabilitating the channel's water supply via treatment.

Lastly, the San Pascual Park are important public recreation resources serving communities with historically limited access to parkland and open green space. Though the DEIR recognizes that construction activities including grading, excavation, and the operation of heavy equipment would “temporarily” affect park users and disrupt normal recreational use, it fails to seriously analyze the long-term impact to local recreation. It is critical that San Pascual Park and all City parklands along the Arroyo Seco remain a public open space asset, inviolate and in perpetuity, and that no San Pascual parkland be compromised for the purposes of industrial infrastructure as proposed by this Project.

The two alternatives proposed in the DEIR, the San Pascual Park Tree Conservation Alternative and the Alternative Site Baseball Field Conservation Option, are also inadequate because neither substantially reduces the project's footprint and potentially significant environmental impacts outlined in the DEIR. Both continue to introduce major water infrastructure into sensitive and culturally significant Arroyo Seco parkland, and result in substantial disturbance to recreation and public access to the San Pascual Park area; with no resolution of the fundamental concerns regarding impacts raised by local stakeholders and Tribal communities who have continued to advocate for full avoidance.

The myriad of submitted public comments viewable in the DEIR's appendices, and the continued advocacy of different community organizations and tribal governments, have made it clear that the community requests a true avoidance alternative that preserves San Pascual Park and other City-owned parklands to avoid impacts to sacred lands, public open space, and sensitive biological resources. These community members and stakeholders deserve to be meaningfully engaged throughout the development of this project, and to have their concerns be taken into consideration and addressed before the certification of the DEIR and any advancement of this project.

For all of these reasons, I oppose the Arroyo Seco Water Reuse Project and we strongly urge the City of Pasadena to reject the Draft Environmental Impact Report. Thank you for your consideration. Should you have any questions, please contact Kevin Ocubillo, Planning Director, at kevin.ocubillo@lacity.org.

Sincerely,

A handwritten signature in black ink, reading "Ysabel Jurado". The signature is fluid and cursive, with the first name "Ysabel" and last name "Jurado" clearly distinguishable.

Councilmember Ysabel Jurado,
Los Angeles City Council, 14th District