

## ENVIRONMENTAL ADVISORY COMMISSION MEMORANDUM

To: Pasadena Water and Power  
From: Environmental Advisory Commission  
Date: April 2021  
Subject: Draft Water System Resources Plan (WSRP)

The Environmental Advisory Commission (EAC) is pleased to present comments pertaining to the Draft Water System Resources Plan (WSRP) prepared by Pasadena Water and Power (PWP). These comments are largely a result of our review and analysis of a report entitled *Raymond Basin Assessment* prepared by consulting firm Zanjero (2018), which was commissioned by PWP. EAC recommends that the City Council consider the EAC's comments below to properly evaluate the draft WSRP.

1. The Raymond Basin is not managed in a sustainable manner. This is clearly illustrated by the declining groundwater level shown in Figure 1 (Zanjero 2018). In their report, Zanjero concluded:

*The Raymond Basin is not managed in a sustainable manner as evidenced by the decrease in basin groundwater levels over the last 118 years, and is under threat of spreading contamination.*

***PWP and RBMB must change its course and take action to prevent permanent failure of the basin [bold included in the original document].***

2. The Draft WSRP's selected Portfolio F, *Maximize Value of Groundwater/Non-Potable Supplies with moderate water conservation*, is not appropriate for maintaining sustainable water supply and will likely contribute to the deterioration of the groundwater basin. Although it may appear that there is an economic benefit to pumping more groundwater in the short term, this will accelerate the depletion of water, which will be more costly in the long term.

3. In the case of an emergency, drought, or regulatory constraints, where Metropolitan Water District supply is not available or is greatly reduced, water from the Raymond Basin would be the only local water supply available to the City of Pasadena. Under current conditions, the basin volume and water quality are already in decline. During emergencies or drought, there may be limited supply available and further groundwater withdrawals may severely impact the basin's health and sustainability. While PWP stated in Section 5 of the WSRP that they will maintain basin health, they don't provide any data or conclusive statements to that effect nor do they provide any methodologies for monitoring basin water levels and stopping withdrawals if basin levels continue to drop. EAC believes a conservative approach is necessary to prevent further decline of the basin health, and we do not have confidence that the proposed WSRP is protective of the basin water in the short or long term.

PWP is the basin's biggest user and has the most at risk from basin failure but lacks the authority to resolve this issue on their own. As such, the EAC respectfully requests that the City

closely examine the Zanjero report along with the draft WSRP and work to identify and take any actions needed to ensure safe and reliable water supply.

Sincerely,