

1 INTRODUCTION

The purpose of this Section is to introduce the Arroyo Seco Canyon Project (ASCP) Areas 2 and 3 (Project/proposed Project), the applicable environmental review procedures, and the organization of the Draft Environmental Impact Report (EIR).

1.1 Purpose and Scope

The purpose of this Draft EIR is to evaluate and disclose the potential environmental consequences of the proposed Arroyo Seco Canyon Project Areas 2 and 3 (Project/proposed Project). The proposed Project constitutes a “project” as defined in the California Environmental Quality Act (CEQA) Guidelines Section 15378. Pursuant to Section 15367 of the State CEQA Guidelines, the City of Pasadena (City) is the Lead Agency for the Project. This Project is being implemented by the City of Pasadena Department of Water and Power (PWP). However, the City of Pasadena is serving as the Lead Agency, as it has the principal responsibility for carrying out the Project and has the authority for approving the Project and its accompanying environmental documentation.

The City owns the right to divert up to 25 cubic feet per second (cfs) of surface water from the Arroyo Seco for direct use or to spread for percolation into spreading basins for groundwater pumping credits from the Raymond Basin. Of the total amount of water that is infiltrated into the groundwater through the existing spreading basins, PWP has the right to pump between 60- to 80% of that amount for beneficial use in the City’s water supply. The City has historically diverted its 25 cfs surface water right; however, in the two storm seasons following the 2009 Station Fire¹, excessive amounts of sediment washed down from the watershed. The debris flows damaged City structures, greatly reducing the City’s capacity to divert water for spreading. As a result, PWP proposes to repair and replace damaged facilities in the Arroyo Seco Canyon as a part of the proposed Project. The improvements would allow for increased utilization of the City’s surface water rights from the Arroyo Seco and maximize the beneficial uses of this important local water resource. The proposed Project would implement a multi-benefit approach to the repair and replacement of damaged infrastructure in the Arroyo Seco, with the overall Project objective of increasing the beneficial use of the surface water rights held by the City and improving biological functions within the Arroyo Seco. (See Section 3, Project Description for additional details).

EIRs are informational documents “which will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.” (14 CCR 15121). The purpose of this Draft EIR is to present the evaluation of the anticipated environmental effects of the proposed Project.

¹ In 2009, the Station Fire burned 160,000 acres in the San Gabriel Mountains including the Project site.

1.2 CEQA Requirements

CEQA requires the preparation of an EIR for any project that a lead agency determines may have a significant impact on the environment. According to Section 21002.1(a) of CEQA:

“The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.”

CEQA also establishes mechanisms whereby the public and decision makers can be informed about the nature of the project being proposed and the extent and types of impacts that the project and its alternatives would have on the environment if they were to be implemented.

The basic purposes of CEQA are to:

1. Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities;
2. Identify the ways that impacts to the environment can be avoided or significantly reduced;
3. Prevent significant, avoidable impacts to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved (14 CCR 15002).

When applicable, the Draft EIR recommends feasible mitigation measures that can reduce or avoid significant environmental impacts. This Draft EIR was prepared in accordance with Section 15151 of the State CEQA Guidelines, which defines the standards for EIR adequacy as follows:

“An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.”

The EIR process typically consists of three parts: (1) the Initial Study and Notice of Preparation (NOP), (2) the Draft EIR, and (3) the Final EIR, which includes the comment letters and the responses to the public comments on the Draft EIR. The Initial Study/NOP is intended to encourage interagency communication concerning the proposed action and to provide sufficient background information about the proposed action so that agencies, organizations, and members of the public can respond with specific comments and questions on the scope and content of the EIR. The City prepared an Initial Study in order to determine which of those environmental considerations under CEQA the Project would either have no impact or a less than significant impact on and, as such, would not need to

be further analyzed within this EIR. Conversely, those CEQA topics addressed in the Initial Study that could result in significant impacts to the environment as a result of Project implementation are further analyzed within this EIR.

An Initial Study and NOP were distributed on November 4, 2019, to federal, State, regional, and local agencies and interested parties for a 30-day review period to solicit comments and to inform agencies and the public of the proposed Project. Hardcopies of the Initial Study/NOP were made available for review at the PWP office located at 150 South Los Robles Avenue, Suite 200, Pasadena, and online at <https://ww5.cityofpasadena.net/planning/category/environmentalnotices/> and/or [PWPweb.com/Arroyo](https://www.pwpweb.com/Arroyo). A scoping meeting was held on Thursday, November 21, 2019, at Robinson Park Recreation Center (1081 North Fair Oaks Avenue, Pasadena) from 6:00 PM to 8:00 PM. The purpose of this meeting was to seek input from public agencies and the general public regarding the environmental issues and concerns that may potentially result from the proposed Project. In compliance with Section 15201 of the State CEQA Guidelines, the City conducted outreach efforts for public participation in the environmental process, prior to the scoping meeting. Public outreach efforts included flyer print outs at community centers and senior centers (including, Jackie Robinson & Robinson Park, Victory Park, Villa Parke); notifications in the Pasadena Star-News, Pasadena In Focus, PWP Watts Current Newsletter, PWP Website/Events Page, and PWP Facebook and Twitter pages; on-air notification at KPCC public radio; e-mails to approximately 1,500 addresses on the Public Works, Parks & Natural Resources distribution list; certified mailings to environmental document distribution list from the City Planning Department; and postal service mailings to property owners within a 500-foot radius of the Project boundary.

The 30-day Initial Study/NOP public review period ended December 6, 2019. The City received nine comment letters in response to the Initial Study/NOP. Table 1-1, Notice of Preparation and Scoping Comment Letter Summary provides a brief summary overview of the NOP comments received by the City that address the environmental issues and identifies the appropriate section of the Draft EIR that addresses the topic. These comments were considered during preparation of this Draft EIR. The Initial Study/NOP is included as Appendix A-1, the Appendices to the IS/MND are included as Appendix A-2, NOP comment letters are included as Appendix A-3, and the Final IS/MND is included as Appendix A-4 of this Draft EIR.

Table 1-1. Notice of Preparation and Scoping Comment Letters Summary

Sender of Comments	Date Received	General Summary of Comments	Addressed In Section(s)
State Agency			
California Department of Fish and Wildlife (CDFW)	December 3, 2019	This letter provides the CDFW's comments and suggestions as a Responsible Agency under CEQA. Comments predominantly pertain to necessary considerations that the CDFW require the EIR to consider, including: required permits; impacts to biological resources including sensitive vegetation communities, wetlands, nesting birds, aquatic and riparian habitats; recommendations for biological surveying; fuel modification; water quality; Project alternatives; direct, indirect, and cumulative impacts of the Project; and project mitigation.	Section 4.2

Table 1-1. Notice of Preparation and Scoping Comment Letters Summary

Sender of Comments	Date Received	General Summary of Comments	Addressed In Section(s)
California Department of Transportation (Caltrans)	December 6, 2019	This letter requests an evaluation of impacts to State facilities (roadways), including a queuing analysis for off-ramps. The letter encourages reduction of vehicle miles traveled generated by construction trucks, and identifies the need for an oversized-transport vehicle permit.	Section 4.8
Governor's Office of Planning and Research; State Clearinghouse and Planning Unit	November 1, 2019	This letter provides proof of receipt of the Notice of Preparation and Notice of Completion, and identifies the State agencies that received the NOP and Initial Study for review. The State Clearinghouse (SCH) Number is 2014101022.	N/A
Regional/Local Agency			
South Coast Air Quality Management District (SCAQMD)	December 3, 2019	The SCAQMD identifies what air quality impacts should be addressed and mitigation measures identified. The SCAQMD provides sources of information related to the air quality and greenhouse gas emissions analyses to be used to meet its requirements, and appropriate mitigation measures to be considered.	Section 4.1 and Section 4.4
Organizations/Individuals			
Arroyo Seco Foundation	December 6, 2019	This letter expresses concern with the environmental and recreational benefits of the proposed Project and requests that the EIR evaluate stream flow requirements to support wildlife; impacts to biological resources and habitat, and alternatives that would rely more on the natural stream hydrology.	Section 4.2, Section 4.5, Section 4.7, and Section 6
Friends of Hahamongna	December 4, 2019	This letter requests evaluation of: cumulative impacts due to other nearby projects; the need for habitat preservation in the Hahamongna; potential for impacts to the Central and Lower Arroyo; and review for the chapter topics identified in the Initial Study.	Sections 4.1 through 4.9; Section 6
Gabrieleno Band of Mission Indians – Kizh Nation	November 11, 2019	This letter requests tribal consultation pursuant to Assembly Bill 52.	Section 4.9
Bill Christian	December 6, 2019	This letter requests evaluation of: alternatives to the Project; evaluation of cumulative impacts related to the Devil's Gate sediment removal project; assessment using the best available information related to percolation rates in spreading basins; and requests decreased diversions and reliance more on the natural stream hydrology.	Section 4.2, Section 4.5, and Section 6

Table 1-1. Notice of Preparation and Scoping Comment Letters Summary

Sender of Comments	Date Received	General Summary of Comments	Addressed In Section(s)
Hugh Bowles	December 4, 2019	This letter focuses on the CEQA requirement to explore alternatives that will have less impact on the environment and achieve the project objectives. The comment requests the restoration of natural flows to the Arroyo Seco rather than increasing stream diversion and the need to consider the cumulative impacts of the projects currently underway in the Hahamongna basin including Devil's Gate sediment removal project.	Section 4.2, Section 4.5, and Section 6
Laura Solomon	December 6, 2019	This email requests that the EIR evaluates restoration of habitat and alternatives to the proposed Project.	Section 4.2 and Section 6

This Draft EIR focuses on the environmental impacts identified as potentially significant during the Initial Study and scoping process. The following issues were determined to be potentially significant and are therefore addressed in Section 4, Environmental Analysis of this Draft EIR:

- 4.1 Air Quality
- 4.2 Biological Resources
- 4.3 Cultural Resources
- 4.4 Greenhouse Gas Emissions
- 4.5 Hydrology and Water Quality
- 4.6 Noise
- 4.7 Recreation
- 4.8 Transportation
- 4.9 Tribal Cultural Resources

The Draft EIR will be made available for review to the public and public agencies for a minimum of 45 days to enable them to provide comments on the “sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (14 CCR 15204). The timeframe of the public review period is identified in the Notice of Availability for this Draft EIR. During this period, a hardcopy of the Draft EIR will be made available for review at the PWP office located at 150 South Los Robles Avenue, Suite 200, Pasadena, and electronic files will be available for viewing online at <https://ww5.cityofpasadena.net/planning/category/environmentalnotices/> and/or PWPweb.com/Arroyo.

During this period, comments from the general public, organizations, and agencies regarding environmental issues analyzed in the Draft EIR and the Draft EIR's accuracy and completeness may be submitted to the lead agency at the following address:

ATTN: Elisa Ventura, P.E.
City of Pasadena Department of Water and Power
150 South Los Robles Avenue, Suite 200
Pasadena, California 91101
Email: eventura@cityofpasadena.net

As the lead agency for the proposed Project, the City has assumed responsibility for preparing this document. The City's Planning Commission will act in an advisory role, and the City Council has final decision-making authority over the proposed Project and associated discretionary actions. The City will use the information included in this Draft EIR to consider potential impacts to the physical environment associated with the proposed Project when considering approval. As set forth in Section 15021 of the State CEQA Guidelines, the City, as lead agency, has the duty to avoid or minimize environmental damage where feasible. Specifically, 14 CCR 15021(d) states that:

“CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a project that will cause one or more significant effects on the environment.”

Prior to approval of the proposed Project or an alternative to the proposed Project, the City, as the lead agency and decision-making entity, is required to certify that the Final EIR has been completed in accordance with CEQA, that the proposed Project has been reviewed and the information in the Final EIR has been considered, and that the Final EIR reflects the independent judgment of the City. CEQA also requires the City to adopt “findings” with respect to each significant environmental effect identified in the Final EIR (California Public Resources Code, Section 21081; 14 CCR 15091). For each significant effect, CEQA requires the approving agency to make one or more of the following findings:

- The proposed project has been altered to avoid or substantially lessen significant impacts identified in the Final EIR.
- The responsibility to carry out such changes or alterations is under the jurisdiction of another agency.
- There are specific economic, legal, social, technological, or other considerations, which make infeasible the mitigation measures or alternatives identified in the Final EIR.

If the City concludes that the proposed Project will result in significant effects that cannot be substantially lessened or avoided by feasible mitigation measures and alternatives, the City must adopt a “statement of overriding considerations” prior to approval of the proposed Project (California Resources Code, Section 21081(b)). Such statements are intended under CEQA to provide a written means by which the lead agency balances in writing the benefits of the proposed Project and the significant and unavoidable environmental

impacts. Where the lead agency concludes that the economic, legal, social, technological, or other benefits outweigh the unavoidable environmental impacts, the lead agency may find such impacts “acceptable” and approve the proposed Project.

As discussed in more detail in Section 2, Environmental Setting, the Arroyo Seco Canyon Project was subject to environmental review under an Initial Study/Mitigated Negative Declaration in 2015, and a corresponding Mitigation Monitoring and Reporting Program (MMRP) was approved by the City. Table 2-1, in Section 2 of this Draft EIR includes the mitigation measures included within that MMRP and summarizes whether those measures remain applicable, are altered/revise, or are no longer applicable, when considering the implementation of the proposed Project. Therefore, the City must also adopt a revised MMRP describing the changes that were incorporated into the proposed Project or made a condition of Project approval in order to mitigate or avoid significant effects on the environment (California Public Resources Code, Section 21081.6). The MMRP is adopted at the time of Project approval and is designed to ensure compliance during Project implementation. Upon approval of the proposed Project, the City will be responsible for implementation of the MMRP, which will be attached to the Final EIR.

1.3 EIR Document Organization

This Draft EIR is organized as follows:

Executive Summary - Outlines the conclusions of the environmental analysis and provides a summary of the proposed Project and the Project alternatives analyzed in the EIR. This section also includes a table summarizing all environmental impacts identified in the EIR along with the associated mitigation measures proposed to reduce or avoid each impact.

Section 1: Introduction - Serves as a forward to the EIR, introducing the Project, the applicable environmental review procedures, and the organization of the EIR.

Section 2: Environmental Setting - Describes the environmental setting of the Project and provides an overview of the Project history and planning context.

Section 3: Project Description - Provides a detailed description of the setting, objectives, characteristics, construction and operation of the proposed Project and required discretionary approvals. Additionally, this section describes the approach to the cumulative impacts analysis, and cumulative projects.

Section 4: Environmental Impact Analysis - Describes the potential environmental impacts of the proposed Project, as well as proposed mitigation measures to reduce or avoid any potentially significant impacts. The discussion in Section 4 is organized by the 9 environmental issue areas as outlined above (Sections 4.1 through 4.9)

Section 5: Mandatory CEQA Topics - Provides a discussion of potential environmental impacts as a result of the proposed Project, including those that can be reduced to a less-than-significant level and those significant environmental effects that cannot be avoided if the Project is implemented. These include impacts that can be mitigated, but cannot be reduced to a less than significant level. This Section also includes a discussion on growth-inducing impacts.

Section 6: Alternatives - Discusses alternatives to the proposed Project, including a No Project Alternative. This Section describes the rationale for selecting the range of alternatives discussed in the EIR and identifies the alternatives considered by the City that were rejected from further discussion as infeasible during the scoping process. Lastly, Section 4 includes a discussion of the environmental impacts of the alternatives that were carried forward for analysis and identifies the environmentally superior alternative.

Section 7: List of Preparers - Gives names and contact information of those responsible for writing this EIR.

Appendices include various technical studies prepared for the proposed Project, as listed in the Table of Contents.

1.4 References

14 CCR 15000–15387 and Appendices A–N. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Public Resources Code, Sections 21000–21177. California Environmental Quality Act (CEQA), as amended.