



Public Comment Form

Name*: Annelisa Moe Organization*: OurWaterLA
Email*: [REDACTED] Phone*: [REDACTED]
Meeting: ROC Date: 8/12/2026

☒ LA County Public Works may contact me for clarification about my comments

*Per Brown Act, completing this information is optional. At a minimum, please include an identifier so that you may be called upon to speak.

Phone participants and the public are encouraged to submit public comments (or a request to make a public comment) to SafeCleanWaterLA@dpw.lacounty.gov. All public comments will become part of the official record.

Please complete this form and email to SafeCleanWaterLA@dpw.lacounty.gov by at least 5:00pm the day prior to the meeting with the following subject line: "Public Comment: [Watershed Area] [Meeting Date]" (ex. "Public Comment: USGR 4/8/20").

Comments

Please see the attached letter with comments from OurWaterLA on the SCWP scoring criteria.



Date: 08/07/2026

To: Regional Oversight Committee

From: OWLA Core Team (DayOne, Heal the Bay, LAANE, LA Waterkeeper, Nature for All, Pacoima Beautiful, The Nature Conservancy and TreePeople)

RE: Scoring Survey Response

On behalf of the OurWaterLA (OWLA) coalition, the undersigned submit the following public comments on the Safe Clean Water Program (SCWP) Scoring Survey. As the SCWP continues to evolve, scoring plays a critical role in ensuring that investments reflect the full intent of the program, including water quality improvements, climate resilience, nature-based solutions, community benefits, and environmental justice. These comments reflect our collective experience engaging with the SCWP and offer recommendations to strengthen the scoring criteria, improve transparency and consistency, and better align evaluation methods with the program's long-term goals.

1. How would you describe your role/relationship relative to the SCW Program?
 - a. Other: OurWaterLA Coalition
2. Rate your familiarity with the SCW Program's current FSG. Rate from 1(No Familiarity) - 5(Extremely Familiar)
 - a. 5
3. In your experience, how clear and understandable are the current Scoring Criteria and associated guidance materials? Rate from 1(Not Clear and Understandable) - 5(Extremely Clear and Understandable)
 - a. 3
4. Please Explain.
 - a. The guidance materials have improved over time and generally communicate program expectations well.
 - b. Information is comprehensive but very dense, making it difficult for new applicants to navigate.
 - c. Guidance is spread across multiple documents and webpages, making it challenging to find everything needed for a competitive application.
 - i. If the project is in the City of LA, you also need to get letters from them, which adds another step.
 - d. Many helpful guidance documents are not easy to find unless applicants already know they exist.

- e. Some scoring criteria would benefit from clearer definitions, metrics, and examples (e.g., how much tree planting or other project features are needed to receive full credit).
 - f. Additional clarification is needed for topics such as community engagement, nature-based solutions, community investment benefits, and disadvantaged community benefits to promote consistent scoring and project implementation.
- 5. How would you rate the overall complexity of the current Scoring Criteria? Rate from 1 (Too Simple) – 5 (Too Complex).
 - a. 4
- 6. Please provide a brief explanation for your response, including any aspects of the Scoring Criteria that you believe are unnecessarily complicated or insufficiently detailed.
 - a. The overall scoring system is unbalanced, with some criteria overly complex while others overly simplistic.
 - b. Categories such as nature-based solutions, community engagement, and community investment benefits lack enough nuance to meaningfully distinguish between projects.
 - c. More graduated scoring scales, clearer metrics, and stronger definitions would better differentiate project quality and alignment with program goals.
 - d. The current framework does not adequately distinguish between high-quality and ineffective community engagement, allowing projects to receive points without demonstrating meaningful outcomes. Establishing minimum expectations would better reward strong performance and discourage superficial or ineffective efforts.
 - e. The same is true for nature-based solutions; the current framework does not adequately distinguish between high-quality and ineffective NBS. For example, minimal efforts such as planting “three trees” can receive similar credit for habitat or shade benefits as substantially larger investments, such as projects with 100+ trees. This reduces the ability to distinguish meaningful differences in community benefit delivery.
- 7. To what extent do you believe the current Scoring Criteria are applied consistently and transparently across projects? Rate from 1(Not Consistently and Transparently) - 5(Extremely Consistently and Transparently)
 - a. 2
- 8. Please Explain.
 - a. The scoring process is generally transparent, and the Scoring Committee has done a good job applying the criteria consistently.
 - b. Consistency is generally stronger within the same project type, but comparisons across planning, design, construction, and O&M projects can be challenging and we would like to see separate rubrics for separate phases.
 - c. The level of evaluation varies across categories, with water quality receiving more rigorous assessment than some co-benefit categories. As such, projects that prioritize different SCWP goals (water quality vs nature-based solutions) are not assessed equitably.
 - i. Some scoring criteria rely on broad definitions or binary thresholds, leaving room for subjective interpretation.

- ii. Expanding point values and creating more graduated scoring tiers for community engagement, nature-based solutions, and community investment benefits would better recognize projects that excel in these areas and better support these program priorities.
 - d. Regional autonomy provides flexibility, which is good, but can also result in differences in how scoring criteria are interpreted and applied once a project moves on to WASC considerations. While project scores were intended to determine which projects advance to the WASC (not to drive funding decisions), in practice, some WASCs rely heavily on scores when selecting projects for funding. Improving the scoring criteria might make it a better decision-making tool. Either way, we recommend also creating clearer expectations for how scores are used by WASCs.
9. To what extent do you believe the current Scoring Criteria effectively evaluates projects that address the most pressing water-related issues in Los Angeles County? Rate from 1(Not effective) – 5(Very effective).
- a. 2
10. Please provide brief justification for your answer, including identification of what you believe these issues are.
- a. Water quality priorities are well addressed, particularly stormwater capture and pollutant reduction, which is critical given that stormwater is the largest source of surface water pollution in Los Angeles County.
 - i. The framework could still better evaluate how individual projects contribute to long-term regulatory outcomes, including compliance with MS4 Permit requirements.
 - ii. The Water Quality criteria could also better recognize projects that reduce pollutants beyond those associated with existing TMDLs, including site-specific contaminants.
 - b. A one-size-fits-all approach does not fully reflect the distinct water challenges across Los Angeles County's nine watersheds, reinforcing the need for more watershed-specific considerations in scoring.
 - c. The scoring criteria effectively support projects that prioritize water quality, and that incorporate elements of other program goals, but under-recognize many well-rounded, multi-benefit projects with a strong focus on other program goals, such as nature-based solutions or climate adaptation benefits.
 - i. Broader climate adaptation goals are not consistently or explicitly captured within the current structure, limiting recognition of benefits such as heat reduction, habitat creation, and community-serving green space.
 - d. The current framework does not recognize environmental water supply benefits, despite their importance to long-term watershed health. Projects that restore natural hydrology, support groundwater-dependent ecosystems, and improve environmental flows provide significant benefits that should be recognized either by expanding the Water Supply category to include environmental water supply, or by increasing the value assigned in the NBS category for the project elements that deliver these environmental water supply benefits.

11. Are there any Feasibility Study Guidelines components (e.g., water quality, water supply, community investment benefits, nature-based solutions) that you feel are overemphasized or underemphasized?
- Water Quality (WQ) - slightly overemphasized
 - Water Supply (WS) - slightly overemphasized
 - Community Investment Benefits (CIB) - slightly underemphasized
 - Nature-Based Solutions (NbS) - slightly underemphasized
 - Disadvantaged Community (DAC) Benefits - extremely underemphasized
 - Community Engagement (CE)- extremely underemphasized
 - Leveraged Funds (LF) - well balanced
12. Please provide justification or any comments.
- WQ - slightly overemphasized
 - Water quality is appropriately central, but its emphasis can overshadow how projects contribute to long-term watershed resilience and integrated planning goals.
 - Water Quality cost-effectiveness is extremely overemphasized and does not fully account for the value of projects that deliver multiple benefits. Projects that provide greater overall public value (habitat, climate adaptation, community investments, etc.) may appear less cost-effective than projects that focus on delivering one or two benefits. This can overshadow broader watershed management goals, regulatory outcomes (including MS4 compliance), and innovative, multi-benefit project design.
 - The current structure allows projects to achieve sufficient points through Water Quality alone, potentially bypassing meaningful contributions to CIB and NBS (central to Measure W voter intent).
 - WS - slightly overemphasized
 - Water Supply is slightly overemphasized within the scoring criteria, particularly for some watersheds with limited infiltration opportunities.
 - Even with a slight overemphasis in scoring, this category is lacking significantly in implementation and might be worth re-evaluation to better recognize beneficial uses of water.
 - This category should better recognize environmental water supply benefits that are currently missing within the program.
 - The current structure allows projects to achieve sufficient points through Water Quality and Water Supply alone, potentially bypassing meaningful contributions to CIB and NBS (central to Measure W voter intent).
 - CIB - slightly underemphasized
 - As currently structured, projects can advance without meaningfully incorporating CIB, despite strong community interest in these types of benefits and outcomes.
 - Community Investment Benefits lack sufficient thresholds and specificity in current metrics.
 - The current framework would benefit from clearer, more graduated metrics for CIB, such as trees per acre, expected shade canopy at maturity, and species diversity or habitat value.
 - Either increasing the total points allocated to CIB or providing more detailed scoring thresholds would better reflect the scale and quality of community benefits being delivered.

- iv. Community Benefits should be required components with minimum scoring thresholds rather than optional or easily bypassed categories.
- d. NbS - slightly underemphasized
 - i. Given their role in providing co-benefits such as habitat creation, heat reduction, and public space improvements, NBS should be more closely weighted to align with water supply benefits.
 - ii. This category also lacks sufficient thresholds and specificity in current metrics. For example, minimal efforts such as planting “three trees” can receive similar credit for habitat or shade benefits as substantially larger investments, such as projects with 100+ trees. This reduces the ability to distinguish meaningful differences in community benefit delivery. iii.

Either increasing the total points allocated to NBS or providing more detailed scoring thresholds would better reflect the scale and quality of co-benefits being delivered by NBS.
 - iv. Nature-based Solutions should be required components with minimum scoring thresholds rather than optional or easily bypassed categories.
 - v. Build on the work of the Nature-Based Solutions Task Force ([County Water Plan Nature-Based Solutions Task Force | Watershed Health](#)). While the Task Force was not charged with developing SCWP scoring recommendations, it created practical tools and guidance for evaluating nature-based solutions that could help strengthen scoring criteria and better recognize the benefits that NBS projects provide.
- e. DAC - extremely underemphasized
 - i. No point allocated at all for this category, which demonstrates its lack of meaningful emphasis in the program.
 1. Allocating dedicated points to this category would introduce a clear checkpoint to confirm and document these benefits, rather than leaving it solely to individual WASCs to define or raise the question.
 2. This would not preclude projects from receiving funding, but would ensure DAC benefits are consistently and explicitly considered in all evaluations.
 - ii. Consider moving away from an all-or-nothing approach and instead increasing a proportional “community benefit ratio” so that projects receive credit scaled to the level of benefit provided, rather than relying on binary or threshold-based determinations.
- f. CE- extremely underemphasized
 - i. There is no meaningful scoring spectrum to distinguish levels of engagement quality or effectiveness. ii. We recommend using the Spectrum of Community Engagement to Ownership: [Spectrum 2-1.pdf](#)
- g. LF - well balanced
 - i. This category would benefit from a more graduated, spectrum-based scoring approach rather than the current step system (e.g., 3 points for 25% and 6 points for 50%).

13. To what extent do you think the current Scoring Criteria effectively evaluates different types of projects (e.g., large vs. small projects, different funding phases, different watershed conditions)? Please rate 1(Low Effectiveness)-5(High Effectiveness) a. 2

14. Please explain.

- a. The current Scoring Criteria provides a general framework for evaluating projects, but it does not consistently or effectively differentiate between large and small projects, different funding phases, or differences between watersheds, including variability in permeability, pollutant loads, available open space, and buildable land, which limits fair comparison across projects/regions.
- b. Small projects in particular face challenges in achieving sufficient water quality or water supply points to compete effectively, which may unintentionally disadvantage community-scale or innovative projects.
- c. A more watershed-specific approach to scoring could improve alignment with local conditions and project feasibility
- d. Guidance documents have improved clarity around project phases, but the scoring framework itself has not been fully adapted to reflect those differences in evaluation.

15. How could the revised Scoring Criteria more effectively incorporate and reflect community needs and priorities in light of the new Community Strengths and Needs Assessment?

- a. Require applicants to clearly justify how proposed project benefits are tied to documented community needs (e.g., CSNA, park needs assessments, heat maps, or other engagement data), ensuring that Community Investment Benefits reflect actual community-stated priorities rather than assumed benefits.
- b. Strengthen scoring by requiring evidence that projects address identified community needs, with the expectation that full Community Investment Benefits points should not be awarded unless those needs have been identified and documented as discussed above (e.g., CSNA, park needs assessments, heat maps, or other engagement data).
- c. Include Tribal engagement as a distinct and explicitly recognized component within both the CSNA and Scoring Criteria, ensuring it is meaningfully considered rather than embedded within general community engagement categories.

16. Are there barriers within the current FSG process that may limit participation from certain groups or communities? Please rate the extent of these barriers on a scale of 1(No Barriers)-5(Significant Barriers).

a. 5

17. Please provide brief justification for your answer.

- a. The application process is resource-intensive and creates a high burden in terms of staff time, funding, and technical expertise, which can limit participation from smaller municipalities, community-based organizations, and tribal entities.
- b. The Technical Resources Program (TRP) is helpful, but still requires significant time and capacity, and is not equally accessible to all applicants.
- c. Requirements for letters of non-objection and early O&M commitments create significant hurdles, even for projects seeking TRP funding. Requiring agency commitments before feasibility is established can discourage innovation and

delay worthwhile projects. The process should distinguish between feasibility-stage funding and implementation-stage approvals so promising projects can move forward before long-term ownership and O&M decisions are required.

- d. Cost-effectiveness requirements under the water quality category can disproportionately disadvantage smaller or distributed projects, even when they provide strong local or community benefits.
- e. The scoring framework favors larger, more resourced applicants and projects that align more easily with water quality metrics, while creating barriers for nature-based solutions or community-centered projects.

18. What specific changes would you recommend to improve the SCW Program Scoring Criteria?

- a. Align scoring with real-world outcomes and climate adaptation priorities, including explicit connections to community needs assessments, disadvantaged community priorities, MS4 compliance outcomes, and long-term watershed resilience.
- b. Rebalance scoring categories, with metrics-based and graduated scoring across all categories, to better align with multi-benefit program goals, elevating Community Benefits, NBS, and Community Engagement so they are more comparable to Water Quality and Water Supply, rather than being secondary considerations.
- c. Introduce mandatory minimum expectations for categories like Community Benefits and Community Support, to ensure all funded projects meaningfully address community needs.
- d. Improve accessibility for smaller, community-based, and less-resourced applicants to supporting more equitable participation.
- e. Develop watershed-specific scoring to better reflect differing physical and environmental conditions across LA County.
- f. Update criteria to emphasize impervious surface reduction to incentivize hardscape removal and increased infiltration.
- g. Incorporate learning from completed projects and performance data to continuously refine scoring criteria and improve alignment with actual project effectiveness over time.

19. How should the FSG evolve to reflect recent SCW Program developments (e.g., Initial Watershed Plans, updated metrics, policy changes)?

- a. The FSG should function as a living, adaptive management tool that is regularly updated based on program learning, implementation experience, emerging watershed priorities, and feedback from completed projects.
- b. Stronger integration with Watershed Plans should guide scoring updates, with projects receiving recognition across categories when they directly advance watershed-specific goals and priorities.

Sincerely,

OurWaterLA Core Team (DayOne, Heal the Bay, LAANE, LA Waterkeeper, Nature for All, Pacoima Beautiful, The Nature Conservancy and TreePeople)

OurWaterLA is a diverse coalition of community leaders and organizations from across Los Angeles County united to create a strong water future for Los Angeles. Our goal is to secure clean, safe, affordable and reliable water for drinking, recreation and commerce now and for the future. We have a deep commitment to uphold the trust that voters had in us when passing this measure and that projects which achieve Safe Clean Water Program objectives of water quality, water supply, nature-based solutions and community investments are prioritized.



Public Comment Form

Name*: Barbara Eisenstein Organization*: Barbara Eisenstein
Email*: [REDACTED] Phone*: _____
Meeting: 8/12/26 - SCWP - ROC (ULAR) Date: 8/12/26

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Comments

I will be giving public comment in person at the 8/12/26 SCWP, ROC, ULAR.

Friends of
SOUTH PASADENA
NATURE PARK

To: Safe Clean Water Program, Regional Oversight Committee
From: Barbara Eisenstein, Friends of the South Pasadena Nature Park,
[REDACTED]
Date: August 12, 2026
Subject: Written Submission Accompanying Oral Comments on the Arroyo Seco Water Reuse Project

Something has gone wrong with the SCW Program. I understand that overseeing individual projects is the responsibility of the local WASCs, however, the Arroyo Seco Water Reuse Project exemplifies a program-wide failure. Despite its many committees, reports and administrative levels, there does not seem to be a clear, straight-forward way to evaluate and correct for problems that are actually happening on the project level.

The Water Reuse Project has changed since it received its first nearly \$1.2M award. Project costs have gone up, yet it no longer captures and purifies wet weather stormwater. Nor will it improve water supply in Pasadena through groundwater recharge, given the Project's own geotechnical analysis. So the project changed – it got more expensive and provides fewer benefits. Why wasn't this addressed through the WASC?

The project continues to be promoted as a way to meet “a TMDL... an unfunded mandate by the Los Angeles Regional Water Quality Control Board.” However, the Water Board has stated in their comment letter of July 2, 2026, the project will capture minimal stormwater runoff, will not achieve wet-weather compliance, and “is not required by the TMDL or the MS4 Permit.” Still, the project proponents, and apparently this Program, stick to this erroneous position.

As a resident of South Pasadena, I must express my concern over other Arroyo Seco projects that have received funding from SCW. For FY 2026–27, South Pasadena requested over \$1M for planning and design for the Arroyo Park Infiltration Gallery, with anticipated costs for construction exceeding \$10 million. As I understand it, this has been recommended for funding by the ULAR WASC, pending final approval by the LACo Board of Supervisors.

As you probably know, this project is one of four proposed by South Pasadena. Each relies on water diverted from the Arroyo Seco. These projects must not receive additional funding until the Water Reuse Project is approved and the water diversion permitted – which I hope it is not. Most importantly, should the SCWP be promoting and funding projects that divert Arroyo Seco water to irrigate and landscape our parklands?

These projects suggest broad programmatic deficiencies. As a tax payer, I have voted for bond after bond to improve our region and have been disappointed with what my money has bought. This program is especially disappointing and yet will continue to be funded in perpetuity, unless the voters bring a proposition to end it. If such a proposition was on the ballot right now, I know how I would vote.



Public Comment Form

Name*: James Cluxton Organization*: OhanaVets, Inc.
Email*: _____ Phone*: _____
Meeting: ROC Date: _____

☒ LA County Public Works may contact me for clarification about my comments

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Comments

This public comment concerns OhanaVets' unresolved request for ROC oversight of the County's July 8, 2025 LSGR Watershed Coordinator selection.

For more than thirteen months, OhanaVets repeatedly presented documented concerns through the County's operational, legal, contracting, and oversight channels, including multiple submissions to the ROC. No identified County office or body reviewed the cumulative record on its merits or determined whether corrective action was warranted. As of this submission, the ROC has not acknowledged OhanaVets' August 3 oversight request or either of its August 4 supplements.

This form provides a summary of OhanaVets' public comment. The complete written comment is attached as a separate PDF and incorporated by reference. OhanaVets requests that the complete comment be entered into the official meeting record and distributed to all ROC members. OhanaVets further requests that the ROC address the oversight submission through its established responsibilities, identify the accountable next step, and advise OhanaVets and the public what action or referral will follow.

Respectfully submitted,

Jim Cluxton
President, OhanaVets, Inc.



OHANAVETS PUBLIC COMMENT
REGIONAL OVERSIGHT COMMITTEE
AUGUST 12, 2026 MEETING

For more than thirteen months, OhanaVets has presented documented concerns regarding the County's July 8, 2025 selection of Dudek as the Lower San Gabriel River Watershed Coordinator through Public Works, the LSGR WASC, the ROC, County Counsel, CPRA channels, and the Board of Supervisors.

The County responded to discrete matters through letters, records determinations, referrals, denials, prospective commitments, and procedural closures. What remains absent is an identified County office or body that accepted responsibility for reviewing the cumulative public-access, procedural-fairness, conflict-review, and recordkeeping concerns on their merits or determining whether corrective action was warranted. The challenged interviews, deliberations, recommendation, and vote remain unchanged.

The August submissions were not the ROC's first notice of these issues. They were the latest and most organized presentation of concerns OhanaVets had previously raised before the ROC through written public comments, oral public comments, supporting records, and requests for review. Those earlier submissions produced no identified comprehensive merits review, corrective decision, or accountable referral.

On August 3, 2026, OhanaVets submitted a four-document request for ROC oversight. Two supplemental memoranda followed on August 4. On August 10, the ROC was copied on a further transmission containing three documentary summaries. In total, the ROC received or was copied on four August transmissions containing nine documents addressing the underlying record, the County's response history, and the absence of an identified merits-review pathway.

The August 3 submission expressly requested confirmation of receipt, distribution to ROC members, preservation in the ROC record, identification of an assigned contact and timetable, and information concerning the next procedural step. Each August 4 supplement renewed the request for confirmation.

As of this public-comment submission, OhanaVets has received no acknowledgment of the August 3 submission or either August 4 supplement, no confirmation that the materials were distributed to ROC members or preserved with the ROC's records, and no information concerning an assigned contact, review process, referral, timetable, or next procedural step.

OhanaVets respectfully requests that this comment and the previously transmitted materials be entered into the official meeting record and distributed to all ROC members. Because the underlying matter is not listed for substantive consideration on the August 12 agenda, OhanaVets is not requesting a merits determination at this meeting. It asks the ROC to address the oversight submission through its established responsibilities, identify the accountable next step, and advise OhanaVets and the public what review, action, or referral will follow.



The central question is straightforward: after more than thirteen months of documented notice, who is responsible for reviewing the cumulative record on its merits, and what action will follow?

Respectfully submitted,

Jim Cluxton
President, OhanaVets, Inc.



Public Comment Form

Name*: Yael Pardess Organization*: Save San Pascual Park
Email*: [REDACTED] Phone*: [REDACTED]
Meeting: regional oversight committee-safe clean water Date: aug 12.2026

☒ LA County Public Works may contact me for clarification about my comments

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Comments

Once again, I d like to draw this boards attention to the Water Reuse Project, at San Pascual and San Rafael and ask you to audit project, review whether it complies with its original goals and original design, and whether it needs a fresh restart, and its funding halted. There is a strong push by Pasadena and South Pasadena to get this approved in spite of growing opposition by experts, environmental groups, and thousands of letters and signatures from the public. It is clear since project started years ago, that Pasadena is not listening to the opposition, or modifying project based on hundreds of comments.

Project design was not modified, even after AS 41(San Rafael) was declared a non priority dry weather outfall in the 2024 Adaptation to the Load Reduction Strategy, and became a HIGH PRIORITY wet weather outfall. San Rafael stayed a dry weather project with a small man made pond with a very limited capacity to address wet weather water volumes.

Project also do not address the Geology report that clearly states it will allow mostly lateral infiltration, and therefore will not achieve the infiltration goals. The Arroyo concrete channel may be compromised as a result of storing too much water without vertical infiltration.

At San Rafael, The project could have created a larger wetland, by eliminating the concrete channel leading water from Johnston Lake. Instead, it is a predominantly dry climate vegetation, with a very small wetland riparian area adapted to dryness.

Both projects have a lined concrete bottom that directs water forward and do not allow for infiltration.

The ecological and environmental damages at San Pascual were decried by many. I personally reviewed every tree in the tree report, and compared various lists to see which will be removed. Aside from finding many discrepancies, I reviewed several ancient large protected trees that will

From: [Yael Pardess](#)
To: [DPW-SafeCleanWaterLA](#)
Subject: Comment form for Aug 12 Water regional board meeting
Date: Tuesday, August 11, 2026 12:07:35 PM
Attachments: [Comment-Card-Form Yael Pardess.pdf](#)

CAUTION: External Email. Proceed Responsibly.

Att: Regional Oversight Committee- Safe Clean Water- Comment for the Aug 12 meeting

I am attaching the PDF as you requested as my comment.
However the pdf does not include ALL my comment so I am attaching the full comment in the email.

Once again, I d like to draw this boards attention to the Water Reuse Project, at San Pascual and San Rafael and ask you to audit project, review whether it complies with its original goals and original design, and whether it needs a fresh restart, and its funding halted. There is a strong push by Pasadena and South Pasadena to get this approved in spite of growing opposition by experts, environmental groups, and thousands of letters and signatures from the public. It is clear since project started years ago, that Pasadena is not listening to the opposition, or modifying project based on hundreds of comments.

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Both projects have a lined concrete bottom that directs water forward and do not allow for infiltration.

The ecological and environmental damages at San Pascual were decried by many. I personally reviewed every tree in the tree report, and compared various lists to see which will be removed. Aside from finding many discrepancies, I reviewed several ancient large protected trees that will disappear. No young saplings can replace their ecological value. It is simply unforgivable in this day and age to remove mature healthy canopies that provide so many benefits that will be lost for at least 20 years!

The only reason San Pascual location was chosen is its diversion and ability to direct water to the South Pasadena Golf Course. Other locations were examined and rejected mainly because of the lack of the diversion facility. Cities should not be using precious river waters. The golf

course should use recycled water, like many golf courses worldwide.

Pasadena claims they will direct same historical amount of water to the golf course, but also claimed in the MND, that they have abandoned this practice because of pollution. They also claimed they plan on EXPANDING the use of water. South Pasadena refuses to divulge how much Arroyo water they have been using. Their water rights are not confirmed. Overall, 535 af of water will be captured at San Pascual. 320 af will not be returning back to an already depleted river. We have no assurance that future water capture will not be higher than declared. This in itself is unconscionable. The river's health depends on water, especially in dry seasons. Both projects will not treat stormwater, or the pollution they may carry.

This extensive water withdrawal in dry seasons will impact any restoration efforts of the channel and its Rainbow trout and Steelhead trout. The DEIR dismissed fish existence, and all environmental impacts on the area, on the health of the community and the existing wildlife corridor. Again- this is unacceptable!

We are asking this committee to stop this project.

Persisting in this project just because it gone on for so long and may lose its funding if modified, is not a justification to build this badly designed project. It needs to stop! Go back to the community, go back to the Kizh tribe who are asking for full avoidance of the site at San Pascual, engage environmental experts that truly understand and appreciate nature, redesign and restore the park, restore the river, like so many cities worldwide are doing. A nature base project does not start by destruction. It protects and rebuilds what already exists. A man-made engineered pond will never be as good as nature itself.

Yael Pardess



From: [REDACTED]
To: [DPW-SafeCleanWaterLA](#)
Subject: Public Comment August 12
Date: Wednesday, August 12, 2026 1:17:56 PM

CAUTION: External Email. Proceed Responsibly.

To whom it may concern:

I would like to leave public comment as an elected member of the Arroyo Seco Neighborhood Council.

Thank you,
Constance Villalvazo

From: [REDACTED]
To: [DPW-SafeCleanWaterLA](#)
Subject: Wish to speak at today's AUGUST 12, 2026 SAFE Clean Water Regional Oversight Committee meeting.
Date: Wednesday, August 12, 2026 11:15:55 AM
Attachments: [2023110605_RWQCB Comment.pdf](#)

CAUTION: External Email. Proceed Responsibly.

I tried to use your pdf but finally gave up. My Name is Clara Solis. I am a member of Save San Pascual Park.

The funding for the Arroyo Seco Water Reuse Project should be pulled. The project proposed in the DEIR is not viable and is subject to litigation. Please review the letter from the Los Angeles Regional Water Quality Control Board which states in part,

“the DEIR specifically state that the Project is required to meet the TMDL or that the Los Angeles Water Board has mandated the Project’s implementation. The DEIR cites the Los Angeles Water Board’s approval of the Upper Los Angeles River Watershed Management Group’s Watershed Management Program (WMP) and embedded Load Reduction Strategy (LRS) to support these conclusions. However, approval of a WMP does not constitute approval of specific projects in the WMP or a mandate that those specific projects be implemented....

since the focus of the Project is now on dry-weather diversions from San Rafael Creek and the Arroyo Seco with minimal capture of stormwater runoff in San Rafael Creek, it will not assist in compliance with the TMDL in wet weather....

the diversion point in San Rafael Creek is at the downstream end of the creek above its confluence with the Arroyo Seco. Therefore, this diversion will not result in compliance with the TMDL in dry weather in the portion of the creek above the diversion point. In addition, the diversion in the Arroyo Seco is a redesign of an existing diversion and will not provide additional compliance with the TMDL in dry or wet weather.

In conclusion, the Project is not required by the TMDL or the MS4 Permit....

The Los Angeles Water Board disagrees with the finding of No Impacts related to the Project conflicting or obstructing the implementation of a Water Quality Control Plan.... Because the project will result in impacts to beneficial uses through the diversion of San Rafael Creek and the removal of the unnamed stream and wetland at the San Pascual site, the finding of No Impacts is inaccurate....

we disagree that the No Project alternative would result in greater impacts to water quality...A no net positive impact does not equate to an adverse negative impact. In fact, the proposed project would degrade the existing ecological habitat and beneficial uses during dry-weather conditions through the removal of all flow. In addition, the proposed alternative would remove existing vegetation at the sites, which would temporarily increase the heat island effect and decrease shade and tree cover until new vegetation is established....

Final compensatory mitigation is subject to approval by the Los Angeles Water Board during the CWA Section 401 Water Quality Certification permitting process.....

The Proposed Project will divert water all dry-weather and some wet-weather flows. As such, the DEIR should include a discussion of the Cities’ water rights to San Rafael Creek and the Arroyo Seco Reach 1 and how the proposed diversion and use of the water will meet these rights....

San Rafael Creek as a storm drain (e.g., p. 2-13). San Rafael Creek is not a stormwater facility but a water of the state.”

We urge you to end this horrible money wasting project now. It is clear from these comments that this project will not ultimately go forward. It does not appear given the comments that a 401 certificate which will be required will be issued. If this project is approved by the City of Pasadena, a lawsuit will be filed with substantive evidence against the project, the opponents to the project will win.

The residents of Los Angeles did not vote for measure W for this type of project. They did not for Measure W to fund projects in wealthier cities while ignoring communities like East Los Angeles. We urge you to stop this nonsense, use the money instead to develop and fund a true nature-based solution that will clean the water and benefit the residents of Los Angeles County who approved measure W, the residents of the cities of Los Angeles, South Pasadena and Pasadena. With the Arroyo Seco Restoration Feasibility Study in play, now is the perfect time for this type of collaborative approach.

Los Angeles Regional Water Quality Control Board

July 2, 2026

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

Dear Ms. Monde:

RESPONSE TO THE DRAFT ENVIRONMENTAL IMPACT REPORT (SCH NUMBER 2023110605) FOR THE ARROYO SECO WATER REUSE PROJECT

Thank you for the opportunity to comment on the City of Pasadena's Draft Environmental Impact Report (DEIR) for the proposed Arroyo Seco Water Reuse Project (Project). The Project involves the construction of two regional water capture and treatment facilities near the Arroyo Seco.

Specifically, at the San Rafael site, a new diversion would be created in the San Rafael Creek that would redirect all dry-weather flow and a portion of wet-weather flow into a treatment wetland/infiltration basin. The portion not infiltrated would be discharged into the Arroyo Seco. At the San Pascual site, an existing diversion currently directs dry weather flow into a stream and wetland before it is stored and reused for irrigation of the nearby Arroyo Seco Golf Course. The Project would redesign the diversion and replace the existing stream and wetland with a new treatment wetland. Water exiting the wetland would be directed to the Golf Course for irrigation. The two treatment facilities would capture and infiltrate an annual average of 320 acre-feet (af) of water, with 258 af being used for groundwater recharge either in the Raymond Basin or the adjacent basin and 30 af being reused for irrigation at the Arroyo Seco Golf Course.

The goal of the Los Angeles Water Board is to protect beneficial uses within the Los Angeles Region consistent with the Federal Clean Water Act (CWA) and the State of California's Porter-Cologne Water Quality Control Act, which require careful consideration of projects which may result in adverse impacts to water quality and beneficial uses of waters of the State, including hydrogeomorphic changes.

In 2005, the Regional Board approved Resolution No. 2005-002, which outlines goals to address hydromodification of our region's water courses in order to prevent impacts to water quality. Hydromodification is considered the alteration away from a natural state of stream flows or the beds or banks of rivers, streams, or creeks, including ephemeral washes or drainages. The resolution sets forth a process to achieve one of the Regional Board's highest priorities, which is to maintain and restore, wherever feasible, the physical and biological integrity of the region's water courses.

In consideration of the Los Angeles Water Board's objectives, we have the following comments on the DEIR:

1. TMDL Compliance

The Project is proposed to help compliance with the water quality based effluent limits and receiving water limits set forth in the Los Angeles Water Quality Control Board (Los Angeles Water Board)'s Municipal Separate Storm Sewer System (MS4) Permit (Order No. R4-2021-0105), which are based on the Waste Load Allocations in the Los Angeles River Bacteria Total Maximum Daily Load (TMDL). Several sections in the DEIR specifically state that the Project is required to meet the TMDL or that the Los Angeles Water Board has mandated the Project's implementation. The DEIR cites the Los Angeles Water Board's approval of the Upper Los Angeles River Watershed Management Group's Watershed Management Program (WMP) and embedded Load Reduction Strategy (LRS) to support these conclusions. However, approval of a WMP does not constitute approval of specific projects in the WMP or a mandate that those specific projects be implemented.

Furthermore, the Project has evolved over time since the original approval of the WMP and LRS in 2015. The original project design included the capture of stormwater runoff from the 85th percentile design storm, but now the Project focuses on the diversion of dry-weather flows. The revised WMP approved by the Los Angeles Water Board in 2024 provided preliminary schematics for four proposed concepts but did not provide detailed designs for a final selected project, so the Project as defined in the DEIR was not included in the WMP approved by the Board. Regardless of the WMP approval implications, since the focus of the Project is now on dry-weather diversions from San Rafael Creek and the Arroyo Seco with minimal capture of stormwater runoff in San Rafael Creek, it will not assist in compliance with the TMDL in wet weather.

Additionally, the diversion point in San Rafael Creek is at the downstream end of the creek above its confluence with the Arroyo Seco. Therefore, this diversion will not result in compliance with the TMDL in dry weather in the portion of the creek above the diversion point. In addition, the diversion in the Arroyo Seco is a redesign of an existing diversion and will not provide additional compliance with the TMDL in dry or wet weather.

In conclusion, the Project is not required by the TMDL or the MS4 Permit, it will not help comply with the TMDL in wet weather, and it will only help comply with the TMDL in dry weather below the diversion point in San Rafael Creek.

2. Impacts to Waters of the State

In general, the direct or indirect impacts of the Project on waters of the state have not been fully analyzed in the DEIR, as specified below.

- a. The new diversion of dry-weather and of some of the wet-weather flows at the San Raphael site would result in potentially significant impacts to beneficial uses within San Raphael Creek and in the downstream receiving waters in all but the highest flow conditions, which should be analyzed.

Section 3. *Biological resources* (p. 3.3-37) of the DEIR incorrectly states that the diversion "would not affect flows to downstream waters other than a beneficial impact through improving the quality of the water flowing into the Arroyo Seco Channel from the San Rafael Creek drainage area". However, although the diversion of water would

prevent pollutants present in the water from reaching the Arroyo Seco, the removal of the water would effectively remove all beneficial uses in San Rafael Creek and potentially affect downstream beneficial uses.

The same section of the DEIR also states that “there is no habitat being supported by runoff downstream of the sites that would be adversely affected by the 320-acre feet average annual water capture for water supply resulting from Project implementation. Runoff from this watershed drains to over 50 linear miles of the Los Angeles River, which is largely channelized, and then to the Pacific Ocean”. This is inaccurate, as demonstrated by the beneficial uses designated for the Arroyo Seco and the Los Angeles River below the diversion point, including Warm Freshwater Habitat (WARM), Wildlife Habitat (WILD), Rare, Threatened, or Endangered Species (RARE), Spawning, Reproduction, and/or Early Development (SPWN) and Migration of Aquatic Organisms (MIGR).

- b. The DEIR should consider cumulative impacts of projects that would collectively contribute to water quality impacts, including beneficial uses. For example, there are currently several stormwater diversion projects planned along the Arroyo Seco that will decrease the amount of water in the stream (e.g., Arroyo Park Infiltration Gallery). The cumulative impact that these projects will have on beneficial uses in downstream waters should be evaluated. However, the proposed DEIR does not include such comprehensive analysis. Instead, section 3.6.7 Cumulative Impacts under *Hydrology and Water Quality* (p.3.6-20) limits its consideration of cumulative impacts to two residential projects. Section 3.3.7. Cumulative Impacts under *Biological Resources* (p. 3.3-45) mentions regional stormwater capture and infiltration projects that cumulatively influence the hydrology and habitat; however, it bases the determination of less than significant impacts solely on cumulative impacts related to vegetation removal during construction.

3. Impacts to Water Quality Standards

- a. Under Threshold 3.6a: *Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?* (Section 3.6.6. *Environmental Impacts* under *Hydrology and Water Quality*; p. 3.6-16), the DEIR focusses on impacts to water quality objectives. Specifically, the document states that “Operation of the Project would not violate any water quality standards, as the Project would contribute to meeting the ULAR water quality targets and would not introduce new contaminants to the runoff from the site.” Note that water quality standards include water quality objectives (targets), beneficial uses and antidegradation requirements. The DEIR should be revised to include consideration of all three components of water quality standards.
- b. The Los Angeles Water Board disagrees with the finding of No Impacts related to the Project conflicting or obstructing the implementation of a Water Quality Control Plan (Section 3.6.6. *Environmental Impacts* under *Hydrology and Water Quality*; p. 3.6-19). The DEIR rightfully notes that the Los Angeles Water Board’s Water Quality Control Plan (Basin Plan) establishes beneficial uses, water quality objectives, and implementation programs for all surface and groundwater bodies within the region, and that it is designed to preserve and enhance water quality and protect beneficial uses. Because the project will result in impacts to beneficial uses through the diversion of San Rafael Creek and the removal of the unnamed stream and wetland at the San Pascual

site, the finding of No Impacts is inaccurate. The DEIR should be revised to consider these impacts.

4. Avoidance and Minimization Analysis

- a. The Los Angeles Water Board believes avoidance is the best strategy for managing potential water quality impacts and strongly discourages temporary or permanent impacts to waters of the state when avoidable. When impacts are unavoidable, they should be minimized to the maximum extent possible. In addition, as stated in a letter addressed to Los Angeles County on August 29, 2023, which was posted to the Los Angeles Water Board website, forwarded to MS4 permittees and read into the record at the November 2024 Los Angeles Water Board meeting, diversion projects intended to address upstream discharges should be undertaken as a last resort to comply with receiving water limitations. Permittees should address stormwater and non-stormwater flows prior to their discharge into receiving waters.

Accordingly, the DEIR should consider alternatives that minimize impacts to waters of the state to the maximum extent possible and demonstrate how the chosen alternative is the Least Environmentally Damaging Practicable Alternative (LEDPA). In particular, the project proponent has not considered alternatives including the release of some or all of the dry-weather and wet-weather flow back to the stream after treatment. Note that issuance of a CWA Section 401 Water Quality Certification may be denied should the project not meet this criterion.

- b. In addition, we disagree that the No Project alternative would result in greater impacts to water quality because the improvements associated with the proposed project ("water quality improvements, enhanced habitat and park space, improved flood protection, improved waterway access, recreational opportunities, reduced heat island effects, and increased shade and trees") would not be implemented (p. 4-12). A no net positive impact does not equate to an adverse negative impact. In fact, the proposed project would degrade the existing ecological habitat and beneficial uses during dry-weather conditions through the removal of all flow. In addition, the proposed alternative would remove existing vegetation at the sites, which would temporarily increase the heat island effect and decrease shade and tree cover until new vegetation is established.

5. Mitigation

To the extent impacts are not avoided, the DEIR should propose compensatory mitigation for the significant impacts to water quality and beneficial uses related to the permanent placement of an instream diversion and the complete elimination of flows in all but the highest precipitation events in addition to mitigation for the impacts to the existing unnamed stream and wetland. The compensatory mitigation must ensure that there is no net loss of the overall abundance, diversity, and condition of aquatic resources, based on the watershed profile. Final compensatory mitigation is subject to approval by the Los Angeles Water Board during the CWA Section 401 Water Quality Certification permitting process.

6. Water Rights

The Proposed Project will divert water all dry-weather and some wet-weather flows. As such, the DEIR should include a discussion of the Cities' water rights to San Rafael Creek

and the Arroyo Seco Reach 1 and how the proposed diversion and use of the water will meet these rights.

7. Creek versus Storm Drain

The DEIR erroneously identifies San Rafael Creek as a storm drain (e.g., p. 2-13). San Rafael Creek is not a stormwater facility but a water of the state. The DEIR should be modified accordingly throughout.

Again, thank you for this chance to comment. We welcome the opportunity to work with you and the project proponent to make this project an example of environmental sustainability in California. If we may clarify any of our comments or be of further assistance, please contact Man Voong at (213) 576-6690 or at Man.Voong@waterboards.ca.gov, or Dr. Céline Gallon, at (213) 576-6784 or at Celine.Gallon@waterboards.ca.gov.

Sincerely,

Jenny Newman
Assistant Executive Officer

cc:

Victoria Tang, Environmental Program Manager
California Department of Fish and Wildlife

Wetlands Regulatory Office
U.S. Environmental Protection Agency, Region 9