

**LINDA VISTA-ANNANDALE ASSOCIATION  
P. O. Box 94364  
Pasadena, CA 91109**

September 10, 2015

Ms. Roumiana Voutchkova, Engineer  
Pasadena Water and Power Department  
150 S. Los Robles Ave, Suite 200, Pasadena, CA 91101

Via email: [rvoutchkova@cityofpasadena.net](mailto:rvoutchkova@cityofpasadena.net)

Re: CEQA/NEPA Comments on Draft EIR: Pasadena Non-Potable Water Project

Dear Ms. Voutchkova:

The Linda Vista-Annandale Association (LVAA) appreciates this opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Project entitled Pasadena Non-Potable Water Project.

Incorporated in 1930, LVAA is a California non-profit, mutual benefit corporation, tax exempt under IRC Section 50(c)(4), and corresponding California law, dedicated to the improvement and development of the Linda Vista~Annandale area of Pasadena, and promotion of the general welfare of Linda Vista~Annandale residents.

The Linda Vista~Annandale area consists of roughly 2.5 square miles, extending from the west bank of the Arroyo Seco to the ridge of the San Rafael Hills, and from the Devil's Gate Dam and the 210 Freeway on the north to the 134 Freeway on the south.

The neighborhood includes, and LVAA represents, approximately 1,350 homes.

1. General Comment. As a general matter, LVAA expects that the EIR will fully and comprehensively study all potential significant environmental impacts to the extent that detailed performance-based, enforceable Mitigations are included in the EIR. Further, we expect that Mitigation will not be illegally deferred – when a Plan is called for to provide Mitigation, i.e. the Construction Staging and Traffic Management Plan called out

in proposed Mitigation Measure 3.16-1, legally adequate Mitigation requires that the Plan be included in, or attached to, the EIR – not called out for future preparation. Plus, all such Plans, as part of any Mitigation provision, should be subject to both public review and amendment on a regular basis, preferably annually.

## 2. Phase I – Linda Vista Pipeline Alignment; Project Alternatives; Area of Controversy.

The DEIR incorrectly omits a major and significant Area of Controversy: the Pipeline Alignment through Linda Vista. LVAA and impacted neighbors received little or no effective notice of the EIR Scoping Sessions, and, therefore, were unable to identify the proposed Pipeline Alignment through Linda Vista as an Area of Controversy.

LVAA does not question or object to the proposed Alignment beginning with Afton Street to Wellington Avenue to Linda Vista Avenue. In place of coming down Lida Street, this segment appears to be the best alternative.

Our objections and concerns focus on the next proposed Alignment through Linda Vista: Linda Vista Avenue (between Afton and Laurel Street) to Laurel Street (between Linda Vista Avenue and Parkview Avenue) to Parkview Avenue (between Laurel Street and Washington Boulevard) and then Parkview to Washington Boulevard.

Pipeline construction through these narrow, quiet, tree-lined residential streets will cause enormous and significant environmental impacts to approximately 50 homes, including, but not limited to, pipeline construction corridors up to 40 feet wide within the roadway pavement, sidewalk/parkway, and shoulder areas; closure entirely of Afton, Wellington and Laurel for 1-2 weeks during construction, hindering ingress and egress of residents, for normal and emergency purposes and emergency access; unknown impacts on public and private mature and protected trees; and, all typical construction impacts such as truck trips (up to 20), noise and dust. In addition, while the DEIR requires that construction staging areas be located away from “sensitive receptors”, such staging areas are required for the proposed Project and there is simply no room along or adjacent to these residential streets for any construction staging area. The Mitigations provided for in the DEIR for these streets are not adequate.

However, a feasible Project Alternative, as yet unidentified in the DEIR, exists to fully avoid these streets. The substitute route would take the pipeline Alignment from Linda Vista Ave. to Salvia Canyon; down Salvia Canyon by the shortest, feasible route; and, then, “up” West Drive to Washington Boulevard. As an engineering matter, there is more than sufficient pressure to take the water up West Drive.

Why this Alignment Alternative was left out of the DEIR is not clear. The reduction of impacts on Linda Vista residents is obvious, and, under CEQA, cost savings are not a valid consideration in designing a Project – mitigation of impacts must be the primary factor.

Phase I should be reconsidered. The Linda Vista Salvia Canyon Pipeline Alignment Alternative should be substituted for the Phase I Project Alternative, or, included in the EIR as an additional Alternative, and, also included in the Reduced Intensity, Environmentally Superior, Alternative.

### 3. Construction Staging and Traffic Management Plan.

As indicated, this vital and essential Plan cannot legally be deferred. The Plan must be prepared now as part of the Final EIR and included in the EIR or attached.

While following “best construction practices” is a good provision of the DEIR, LVAA has had better construction experiences, with less impacts, when specific provisions are included in a binding MOU or Plan designed to reduce, manage and mitigate construction impacts. LVAA will submit a copy of a recent such MOU between Pasadena Public Works and neighborhood associations separately from this comment letter, but we suggest that the Plan, which must be prepared now, should include similar provisions for the benefit of neighbors and neighborhood associations to the following ones in the recent MOU: Paragraph 4, Project Contact Information for any purpose (not just noise complaints) with specific persons listed, their cell phones and their authority, and specifically providing for an onsite contact; Paragraph 5, Project Contact Availability; Paragraph 7, Enforcement; Paragraph 9, Construction Truck Traffic;

Paragraph 10, Street closures; Paragraph 12, Safe, Quiet and “Clean” Trucks, an issue of great importance to LVAA; and Paragraph 13, Dust and Clean-Up.

4. Phase I: Brookside Pressure Reducing Station and Booster Pump Station; Hydroelectric Generation Turbine; Instability of Parkview.

The DEIR description and discussion of these proposed facilities are very confusing. It is not clear exactly where both buildings will be located; how each will relate to the other; how pipelines and similar equipment will enter and exit the buildings; how the buildings will relate to the adjacent hill from Parkway down to Washington and West Drive; whether or not these facilities will impinge on the adjacent Equestrian trail; and, what the total “footprint” of these facilities will be.

As to the Equestrian Trail, these trails must remain open and clear for safe equestrian access every day of the year as a condition of a grant received by the City of Pasadena from the Santa Monica Mountains Conservancy (# PLF-607, dated 01/10/1985). The equestrian trails in the Rose Bowl vicinity pass through the area on both the east and west sides of the Central Arroyo. The trail on the west side of West Dr. is loosely marked with telephone poles. Please specify exactly how these facilities will not impinge in any way on the Equestrian Trails, including construction staging and storage of materials.

A better plan with detailed site specifications, as well as better renderings, should be included in the Final EIR.

While it is correct that these facilities must comply with the Secretary of the Interior’s Standards, it is not clear exactly what Pasadena entitlement process will be followed. It is LVAA’s position that these facilities must go through full Design Commission review and approval, including review and approval of a screening landscape plan and all proposed fencing, and, these facilities, in accordance with applicable Zoning, must obtain a Conditional Use Permit for each facility, i.e. either 2 or 3 CUPs.

The hill behind the facilities and the portion of Parkview down to Washington Boulevard have experienced instances of instability in the past, necessitating efforts at shoring and stabilizing by the City. Also, under the proposed Project and the Salvia Canyon Alternative, trenching for pipes will take place in this area. How will the trenching and construction of the facilities, at least one of which, apparently, will be located right up against a portion of the hill and/or the road, not further destabilize this area and/or cause any sort of collapse?

5. Phase IV: Annandale Extension.

Please clarify in the Final EIR whether or not bringing the Pipeline Alignment off the Art Center/ridge area directly to Annandale Golf Club was considered. The current proposed Alignment will cause numerous, significant, impacts to Central Arroyo recreation, neighbors and traffic along Seco, Linda Vista and on North San Rafael.

6. NEPA: Economics.

This proposed Project appears to make very little economic sense as to commercial and residential ratepayers, at least at this point in the conversation. As stated explicitly in the DEIR: The purpose of the proposed Project is to meet approximately 9 percent of PWP's water needs from local, non-potable water sources. Yet, residential and commercial ratepayers will experience years of intense construction impacts throughout much of the City for what appears to be a relatively small benefit unless a large institution is involved. In fact, only large institutions both within and without the Pasadena Water and Power service area will be able to receive and use the non-potable water distributed as a result of the proposed Project.

It is apparent that the main beneficiaries of this proposed Project are a large number of large institutions, many of which are outside of the Pasadena Water and Power service area, such as the Huntington Library and Gardens and Mountain View Cemetery. Further, since it seems obvious that the Project may never extend beyond Phase I, which is on a fast track, the City should acknowledge that the most direct and

immediate beneficiary is the Rose Bowl, including the Golf Courses which do subsidize operations of the Rose Bowl. The Rose Bowl will be able to protect its Golf Course subsidy and maximize operational net profits through implementation of Phase I. Meanwhile, as usual, the Linda Vista neighborhood (as well as long-suffering Northwest neighbors) get all the impacts once again. At a minimum, the Linda Vista Salvia Canyon Pipeline Alignment Alternative discussed above should be accepted and recommended for approval in the Final EIR. Collect any additional cost from the large institutions as discussed below.

In any event, as to Phase I and the balance of the Proposed Project, direct financial benefits to both commercial and residential ratepayers are unclear. There is no discussion of rate stabilization or reductions.

Also, very importantly, there is no discussion of what the large institutions to which the non-potable water is going will be required to contribute to the very large capital cost of this project. The City is seeking grants for the millions and millions involved over many years, but, will the institutions which will directly benefit, including the Rose Bowl, be required to pay back through an appropriate formula the enormous capital investment made up front by the City of Pasadena? As called out by a neighbor at a recent public meeting, "where is the Business Plan"?

Thank you for the opportunity to submit our comments on the DEIR. If you have comments or questions, please contact current LVAA President, Nina Chomsky, at (626) 795-1967, or, at nrchomsky@aol.com.

Sincerely,



Nina Chomsky, LVAA President