

From: S B <samwesbrown@gmail.com>

Sent: Monday, June 30, 2025 12:21 PM

To: cmonde@cityofpasadena.net

Subject: Re: Public Comment Opposing the Arroyo Seco Water Reuse Project — Protect Historic Equestrian & Multi-Use Corridors, Uphold County and State Standards, Advance Mobility Justice

Dear Ms. Monde and Members of the Department of Public Works,

I submit this public comment on behalf of Avocado Heights Vaquerxs by the June 30, 2025 deadline to strongly oppose the Arroyo Seco Water Reuse Project in its current form. This project places in grave danger one of Southern California's oldest and most culturally significant multi-use and equestrian corridors — violating both County and State-adopted trail standards, failing to uphold the legacy of Rancho-era land use planning that explicitly recognized equestrian mobility, and threatening to erase long-standing pathways of Indigenous and working-class transit and recreation.

A corridor with deep historic roots — from Indigenous stewardship to Rancho land grants to modern trail systems

Long before any modern city boundaries existed, the Arroyo Seco served as a natural transportation corridor for Indigenous peoples, including ancestors of the Kizh (Gabrielino) Nation, who relied on these riparian zones for travel, subsistence, and ceremonial routes. The land holds burial grounds and sacred sites still claimed and protected by Kizh descendants today.

Following colonization and secularization, this same corridor became integral to Rancho land grant systems, where vast tracts were explicitly planned to include equestrian mobility — linking ranchos, mission sites, and emerging pueblos. These open routes evolved into early horse trails that later underpinned 19th and early 20th century right-of-way designations, many of which were formally protected in early Los Angeles County planning ordinances.

It is not accidental that Los Angeles County's own General Plans and Community Plans across the San Gabriel Valley repeatedly acknowledge "equestrian trails and staging areas" as historic, protected land uses. This planning lineage — reinforced through ordinances well into the 1970s — treats equestrian corridors not as recreational afterthoughts but as an original form of regional mobility infrastructure, deserving of the same serious stewardship as major roadways.

Modern mobility justice demands preserving historic equestrian and multi-use access

Today, these trails continue to function as essential mobility networks for local equestrians — many of whom are Latino, working-class, and multi-generational residents who sustain charro and vaquero traditions. For these communities, equestrian passage is not a boutique pastime; it is a cultural practice, a form of local transit, and a means of accessing natural and social spaces in neighborhoods where infrastructure otherwise heavily prioritizes cars.

Mobility justice frameworks compel us to defend these corridors. Scholars and planning advocates have documented how mobility justice demands we examine who gets to move safely, by what means, and through whose lands — recognizing that historical exclusions and contemporary racial, economic, and cultural inequities shape who benefits from public infrastructure. In this case, eliminating or degrading equestrian routes through the Arroyo Seco means shutting off an entire mode of culturally rooted mobility that predates — and in fact enabled — the very development of Pasadena and Los Angeles.

Direct conflicts with County and State trail stewardship standards

This project’s design fails to uphold multiple binding and guiding standards:

Los Angeles County Trails Manual (2003)

- Section 1.2 (Trail System Goals):
“Preserve, protect, and enhance existing trail alignments and uses, with special emphasis on equestrian and hiking activities.”
- Section 3.2.2 (Trail Width):
Requires a minimum 8-foot tread width, recommending 10–12 feet for multi-use trails, to accommodate safe passage of mounted riders.
- Section 3.2.3 (Vertical Clearance):
Requires at least 10 feet of vertical clearance to ensure mounted equestrians can safely pass under any overhead structures or tree canopy.
- Section 4.1 (Vegetation Management):
Directs that “native trees and significant vegetation should be preserved whenever possible,” directly contradicting plans to cut 140+ mature trees integral to trail microclimates and stability.
- Section 2.2 (Cultural Resources):
Obligates agencies to identify and avoid disturbance to Native American sacred sites and traditional use areas — obligations that have not been adequately met through consultation with the Kizh Nation.

California State Parks Trail Handbook (2007) & California DPR Trails Manual

- Trail Handbook Section 5.2:
Recommends 10–12 foot tread widths for shared-use trails with equestrians, maintaining native vegetation and shade to ensure user-friendly and sustainable conditions. Calls for tread materials that are “firm, stable but non-slip surfaces such as compacted native soil or decomposed granite,” directly threatened by this project’s heavy engineered footprint.
- DPR Trails Manual Chapter 4 (Trail Construction & Maintenance):
Emphasizes minimal disturbance of ecosystems, contour-following alignments to minimize grading and erosion, and discourages unnecessary clearing of mature canopy — all standards that would be violated by extensive basin excavation and tree removal.

Ignoring these well-established statewide best practices undermines the basic principles of safe, sustainable equestrian and multi-use access throughout California.

Additional equestrian-specific risks documented in Pasadena’s own project scoping

Pasadena’s own EIR Scoping documents highlight further hazards that have not been adequately mitigated:

- No firm assurances on continuous, safe equestrian passage:
References to keeping trails “open during construction” lack binding commitments to maintaining proper width, vertical clearance, or natural tread — risking unsafe, narrow, or incomplete routes.
- Dust, noise, and heavy equipment stress:
Horses are highly vulnerable to respiratory irritants and loud mechanical sounds. The project documents provide no dedicated dust suppression measures, noise control plans, or scheduling limits to protect equestrian users.
- Significant water diversion altering riparian trail conditions:
With up to 175 million gallons annually diverted away, local banks and riparian soils may become dry, more erosion-prone, and harder for hooves, increasing dust and long-term trail degradation.
- No durable maintenance provisions:
There is no funding guarantee for post-construction grading, erosion repairs, or vegetation management essential to keeping these trails safely passable for equestrian and multi-use purposes.

This is a question of cultural continuity, mobility equity, and legal stewardship

Eliminating or diminishing the Arroyo Seco's historic equestrian corridors breaks a chain of cultural continuity stretching from pre-colonial Indigenous routes, through Rancho-era horse networks, into modern protected multi-use trails. It fails our County's own land use commitments, violates recognized State trail best practices, and perpetuates environmental and mobility injustices that fall hardest on communities who have long relied on these corridors.

What we ask

We urge the City of Pasadena and Los Angeles County to halt this project in its current form and instead:

- Fully uphold County and State trail standards, protecting multi-use and equestrian corridors by maintaining appropriate widths, clearances, and natural surfaces before, during, and after construction.
- Guarantee dust control, equipment scheduling, and clear detour planning that specifically protects mounted riders and equestrian groups.
- Engage the Kizh Nation as rightful stewards in any decision involving disturbance of sacred lands.
- Ensure long-term, enforceable maintenance agreements to keep these trails safely graded, vegetated, and accessible.
- Explore alternative green infrastructure or distributed stormwater approaches that protect these historic mobility corridors while still achieving water quality goals.

San Pascual Park and the Arroyo Seco are far more than urban parkland. They are living corridors of Indigenous history, Rancho land grant planning, equestrian mobility, and cultural celebration. Compromising them for narrowly framed engineering benefits, largely benefiting external interests such as a South Pasadena golf course, is to trade away irreplaceable heritage and equitable access for short-term infrastructure gains.

Thank you for considering these critical concerns and for upholding the cultural, ecological, and mobility legacies entrusted to your stewardship.

Respectfully submitted,

Samuel Brown

Avocado Heights Vaquerxs

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