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Comments on the Draft Environmental Impact Report for the Arroyo Seco Water Reuse Project (SCH No. 2023110605)

Dear Ms Monde,

Thank you for the opportunity to submit comments on the DEIR for the “Arroyo Seco Water Reuse Project”. By way of background, I am a fluvial geomorphologist and hydrologist, and Professor of Environmental Planning at the University of California Berkeley (bio attached below). With my *Environmental Planning Studio* class (LandArch205), in February 2026 I visited the San Rafael and San Pascual sites, and reviewed documents for the proposed project. As part of their work in the class, graduate students critiqued plans for the Water Reuse Project and developed an alternative that involves restoration of natural processes. (See [Regulation and Restoration in the Arroyo Seco](#).) Based on this background, I offer the comments below.

1. The proposed project is unnecessary to meet TMDL water quality standards. The stated motivation for the project is to resolve dry-weather bacterial loading from San Rafael Creek (Outfall AS-41) under the TMDL. As clearly demonstrated in the City of Pasadena’s Load Reduction Strategy submitted to the Los Angeles Regional Water Quality Control Board, diversion into a dry well system would resolve this problem, simply and cost-effectively. Thus, from a regulatory compliance perspective, there is no reason to undertake the convoluted, costly, and environmentally impactful project now proposed. The motivation for this project appears to be water supply for the Arroyo Seco Golf Course.
2. There is no bacteria TMDL compliance requirement at the San Pascual site. Disturbance to the San Pascual site appears justified only on the basis of water supply to the Arroyo Seco Golf Course. From its relatively natural vegetated state, the San Pascual site will be transformed for treatment infrastructure and construction access, leading to a loss of 136 trees, including 36 protected species.

3. The promised water supply benefits are based on a hypothesized 258 acre-feet/year of groundwater recharge to the Raymond Basin at San Pascual. This recharge is unlikely to occur because the site is geologically unsuited for recharge. According to the technical studies by Craftwater Engineering (2022: 22), shallow bedrock will prevent deep infiltration needed for significant groundwater recharge:

“...we anticipate that stormwater will mound/perch on top of the bedrock encountered at depths of approximately 9 to 14 feet across the majority of the site... It is anticipated that infiltrated stormwater will move laterally along this contact.”

4. The proposed project misses an excellent opportunity to renaturalize the confluence of San Rafael Creek with the Arroyo Seco, consistent with the goals of Measure W to remove concrete, revegetate the landscape, and allow natural hydrologic processes to filter rainwater and recharge groundwater supplies. Instead, the proposed project would install complicated plumbing at both San Rafael and San Pascual sites. The San Rafael confluence offers one of the best opportunities in the region for real ecosystem restoration in the Los Angeles River basin, and its restoration was called for in both the 2003 Lower Arroyo Master Plan, and in the 2006 Arroyo Seco Watershed Management and Restoration Plan. The feasibility of restoring the confluence was further confirmed in a 2019 report by Stillwater Sciences. The DEIR uses fallacious arguments to dismiss a restoration alternative, including the statement, *“The State has issued a mandate to improve water quality, requiring immediate action to reduce pollutants such as the bacteria TMDL”* and the *“...naturalization alternative would not meet the urgent regulatory deadlines.”* However, as documented in the City’s Load Reduction Strategy, diverting dry weather flows into a dry well upstream of the confluence could resolve the bacteria TMDL expeditiously and cost-effectively. There would be no need for the proposed project, whose real aims are evidently to supply water to the Arroyo Seco Golf Course.

From a scientific perspective, the proposed project is unsound. From a policy perspective, it represents a regrettable step backwards. The proposal can be seen as the result of multiple incremental decisions, prejudice towards heavy-handed engineering approaches, and the strong political pull of providing water to the golf course, which is unrelated to solving the originally cited TMDL regulatory compliance issue. The project as currently proposed illustrates a well-meaning public program gone astray. If implemented as proposed in the DEIR, the result will be a poor use of public funds, and a tragic lost opportunity to realize true ecosystem restoration in one of the few places where that is still possible in the Los Angeles River basin.

Thank you for the opportunity to provide comments on the DEIR and the proposed project.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'G. Mathias Kondolf', with a long horizontal line extending to the right.

G. Mathias Kondolf, PhD
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Bio for G Mathias Kondolf

G. Mathias (Matt) Kondolf is a fluvial geomorphologist and Professor of Environmental Planning in UC Berkeley's Department of Landscape Architecture. He teaches environmental planning, environmental science, and river restoration. Matt's research concerns human-river interactions, including managing flood-prone lands, urban rivers, and river restoration. Recipient of the award for Excellence in Research from the Council of Educators in Landscape Architecture, his >200 scientific articles and books have received over 25,000 citations (*per* Google Scholar). He received his PhD in Geography and Environmental Engineering from the Johns Hopkins University, an MS in Earth Sciences from University of California Santa Cruz, and an AB *cum laude* in Geology from Princeton University. Matt has served on two National Academy of Science panels, two terms on the Environmental Advisory Board to the Chief of the US Army Corps of Engineers, and chaired the Independent Science Review Panel for the Russian River. He has provided expert testimony before the US Supreme Court, US Congress, International Court of Justice and Permanent Court of Arbitration (the Hague).