

STEWARDS OF THE ARROYO SECO

Date: June 27, 2025

From: Stewards of the Arroyo Seco

To: Christina Monde, City of Pasadena Department of Public Works

Re: Scoping Comments for the Arroyo Seco Water Reuse Project (ASWRP)

Stewards of the Arroyo Seco supports cleaning up water quality in the Arroyo Seco and the Los Angeles River by using green infrastructure and nature-based methods. The Arroyo Seco Water Reuse Project (ASWRP) relies on grey infrastructure that will degrade the Arroyo Seco stream and habitat. There is a better way to improve water quality in the Arroyo Seco, and that is to protect and enhance its natural functions. The Mitigated Negative Declaration (MND), now revoked, and the Notice of Preparation fail to comply with the goals of the Los Angeles County Safe Clean Water Program (SCWP), particularly regarding promoting biodiversity, nature-based solutions and community engagement.

You must develop and evaluate a nature-based watershed alternative to the project that encompasses the Arroyo Restoration Corridor (ARC) that extends from the San Rafael Bridge in Pasadena through South Pasadena to the York Boulevard Bridge in Los Angeles.

Key components of the ARC Nature-based Alternative are:

1. Enhance the nature and biodiversity of the Arroyo Seco. San Rafael Creek is more than a storm drain outlet. It is the last relatively natural tributary of the Arroyo Seco. The San Pascual site is a small but valuable preserve that fosters abundant birds and wildlife. Instead of employing industrial facilities and artificial wetlands, ASWRP should utilize methods that will enhance and restore the natural character of the Arroyo and the watershed in this important transition zone.

Nature-based solutions are a high priority goal of the SCWP which is funding the ASWRP. SCWP has recently established a task force to ensure that funded projects prioritize nature-based

solutions. If it is necessary to use mechanical treatment to reduce contaminants, ASWRP should do so in a way that minimizes the impact on habitat and natural stream hydrology.

2. Verify Current Conditions. ASWRP has been based on Enhanced Watershed Management Program (EWMP) and Load Reduction Strategy (LRS) plans that were based on conditions found in 2010 (Crest Study), fifteen years ago. It has taken far too long to clean up the stream, and there has been considerable progress since then in developing green infrastructure and nature-based approaches that would do so. San Rafael Creek (AS-41) was selected by Pasadena as a priority outfall, but that designation should be reviewed before proceeding with a costly and destructive treatment program. The EWMP and LRS programs provide for an adaptive approach to meet TMDL requirements that could include other sites, pollution prevention, conservation, best management practices, and other tools to reduce the contaminant load throughout the Arroyo Seco area. Other storm drain outfalls are discharging significantly higher levels of bacteria than San Rafael Creek. Changing conditions need to be evaluated to verify the best way to meet the water quality goals for the Arroyo Seco in the era of climate change. You must update contaminant sources in the Arroyo Seco and consider other sites and measures to achieve the Arroyo Seco TMDL bacteria goal.

3. Water Quality – Green infrastructure and nature-based methods can produce water quality improvements that meet regulatory standards. A comprehensive program to identify pollutant sources and treat them at the source with on-site retention, bioremediation, public education, and other best management practices can reduce or eliminate pollution in a cost-effective, nature-based way. The California State Water Resources Control Board (SWRCB) is accepting proposals for projects that address nonpoint source pollution. You must consider an alternative that meets regulatory goals using nature-based methods with minimal impact on natural habitat, wildlife, and hydrology.

4. Community Engagement – The EIR should promote community involvement and the energetic participation of stakeholder groups, such as Stewards of the Arroyo Seco, the Council of Arroyo Seco Organizations, Save San Pascual Park, and local agencies, including the City of Los Angeles. It is not sufficient to just announce planning results when the draft EIR is issued without a comprehensive program of community engagement throughout the planning process. Community engagement is another key goal of the SCWP. You must consider an alternative that will utilize extensive community education and engagement.

5. Water Rights - South Pasadena does not have a water right to divert water from the Arroyo Seco, which is a fully appropriated stream. That means there is no more water to export from the stream, and the State Water Resources Control Boards cannot consider new diversion permits. Instead, Pasadena and South Pasadena should work together to provide sufficient water for Arroyo Park in South Pasadena and the Golf Course by reducing turf area, utilizing

native-based landscaping, improving irrigation efficiency, and capturing local precipitation and runoff. South Pasadena cannot divert flow for irrigation, so you must consider alternatives that do not divert water for illegal uses.

6. Remove barriers to fish passage. The ASWRP identified in the revoked Mitigation Negative Declaration and the NOP would create new barriers to fish and wildlife passage at both the San Rafael site and the San Pascual site. There are thousands of native rainbow trout in the upper watershed of the Arroyo Seco that occasionally are released into the Lower Arroyo stream through Devil’s Gate Dam. These trout are genetically the same as the endangered Southern California Steelhead that is listed by both the federal and state government as an endangered species. The ASWRP grey infrastructure facilities would create new barriers for the rainbow trout and for the recovery of the endangered southern steelhead. You must consider alternatives and adopt a plan that does not take endangered steelhead trout.

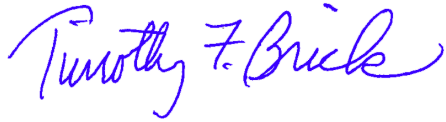
7. Protect the precious habitat that exists in the project area, such as at the San Rafael Confluence and the San Pascual site. You must consider an alternative that protects the high-quality riparian habitat in both of those areas. Lined artificial ponds will not produce genuine riparian habitat. Instead of bulldozing and replanting those sites, remove the invasive species and debris and enhance the high-quality habitat that is already there. Remove the short concrete lining in San Rafael Creek just above the confluence with the Arroyo Seco to allow the stream flow to create a natural wetland and a wide natural connection to the Arroyo Seco stream. This will help restore natural stream hydrology and promote biodiversity. You must consider an alternative that restores stream hydrology and protects and produces genuine riparian habitat and benefits for wildlife.

8. Hire a Consultant Experienced in Nature-based Stream Restoration and Pollution Prevention.

In 2019, at the very beginning of the planning process for what is now called the ASWRP, Tim Brick brought an impressive group of scientists and watershed planners from Stillwater Sciences to the San Rafael and San Pascual sites to discuss nature-based approaches to restoring the project area with city officials from Pasadena and South Pasadena. This enlightening tour was led by Wendy Katagi, a prominent river restoration expert. Attached is the handout she provided which outlines a comprehensive and professional approach to a project that would certainly be award-winning. Instead of pursuing that path, Pasadena retained engineering-oriented consultants with only limited understanding of nature and biology. You must rethink the ASWRP plan and change your consultants to conform with the goals of the Safe Clean Water program and modern stream management in the era of climate change.

Thank you very much for your consideration of the ARC Nature-based Alternative. We hope to work with you to develop a resilient program to improve water quality and watershed management in this major tributary of the Los Angeles River.

Respectfully Submitted,



Timothy F. Brick
Executive Director
Stewards of the Arroyo Seco

Relevant Resources

- [Let's Restore the Arroyo Seco](#) – Pasadena Now, June 27, 2025
- [Source Control fact sheet, including Probable Sources of Contamination in the ARC](#)
- [Nature-based Solution fact sheet](#)
- [Stillwater Paper](#)

References and Resources

Stewards of the Arroyo Seco

Stewards of the Arroyo Seco is a community-based program of Stewards of Public Land, a 501©3 educational foundation. Stewards relies on a science-based approach to environmental restoration and watershed management.

Tim Brick, the Executive Director of Stewards of the Arroyo Seco, has been involved in protecting and restoring the Arroyo Seco for more than forty years. He has been associated with most of the planning efforts and restoration implementation programs.

- 1985-1986 Toward 2000, Pasadena’s Strategic Plan which highlighted the Arroyo Seco and the Devils Gate area as a key planning priority for Pasadena’s future.
- 1985-2012 Member, Metropolitan Water District Board of Directors; Chairman 2006-2010
- 1986-1991 Member, Devil’s Gate Advisory Committee
- 1989-2023 Founder and Board Member, Arroyo Seco Foundation, Managing Director 1998
- 1991-93 Vice-chair, Devil’s Gate Multi-Use Project Joint Powers Authority; ,
Coordinator: Lower Arroyo Low-Flow Stream Restoration Project
- 1993 Birth of Hahamongna Watershed Park
- 1995-98 Hahamongna Operating Company, Executive Director during the establishment of the park and rehabilitation of Devil’s Gate Dam
- 1997-2003 Development and Adoption of Pasadena’s Arroyo Seco Master Plan
- 2002-2023 Participant, USACE/LA County Flood Control District – Arroyo Seco Ecosystem Restoration Program
- 2002-Current Coordinator, Council of Arroyo Seco Organizations
- 2002- 2022 Participant, Council of Arroyo Seco Agencies
- 2004-2015 Coordinator, Arroyo Seco Watershed Management Program funded by the California Department of Conservation

- 2006-2008 Project Director, Central Arroyo Seco Stream Restoration Program, \$2.5 million program funded by the State Water Resources Control Board; restored native Arroyo Chub to the stream
- 2014-2025 Member, San Gabriel Mountains National Monument Community Collaborative
- 2017-current Arroyo Seco Native Trout Recovery Program
- 2019-current Member Upper LA River and Tributaries Working Group, Santa Monica Mountains Conservancy
- 2022-2023 Arroyo Seco Stream Flow Enhancement Program
- 2023-current Executive Director, Stewards of the Arroyo Seco
- 2024-current Member, Los Angeles River Environmental Flows Framework Working Group

Wendy Katagi, CEP

You will note that Wendy Katagi has been involved in many of the key planning activities in the last twenty years (Central Arroyo Stream Restoration, Native Trout Recovery, Stream Flow Enhancement, the 2019 ARC Tour, etc.). Here is her contact information.

- Katagi@mcmillen.com
- <https://www.mcmillen.com/>
- https://www.linkedin.com/in/wendykatagi?utm_source=share&utm_campaign=share_via&utm_content=profile&utm_medium=ios_app

Key Arroyo Seco Planning Documents

One of the prominent gaps in ASWRP planning is the failure to consider and incorporate previous Arroyo Seco planning documents and policies. This is a list of key documents from the last four decades regarding Arroyo planning. Please note the consistent pattern of projects that incorporate Integrated Water Resources Planning methods and that prioritize nature-based solutions.

1988	<p>Master Plan for the Lower Arroyo Seco, Graduate Program, Dept. of Landscape Architecture, Cal Poly, Pomona, June 1988; lays out a vision for Arroyo Seco restoration including biodiversity, stream restoration, and channel removal.</p> <p>https://www.arroyoseco.org/documents/1988-lower-arroyo-606-studio.pdf</p>
2001-2002	<p>Arroyo Seco Ecosystem Restoration Feasibility Study prepared by North East Trees and the Arroyo Seco Foundation for the California Coastal Conservancy</p> <p>https://www.arroyoseco.org/aswrfs.htm</p>
2003	<p>City of Pasadena Arroyo Seco Master Plans</p> <p>https://www.cityofpasadena.net/public-works/urban-forestry/arroyo-seco/arroyo-seco-master-plans/</p> <p>Lower Arroyo Master Plan - https://www.cityofpasadena.net/public-works/wp-content/uploads/sites/29/City-Council-Agenda-Report-September-29-2003.pdf?v=1751232719434</p>
2005-2023	<p>US Army Corps of Engineers/LA County Arroyo Seco Ecosystem Study</p> <p>This webpage has a full list of activities and documents from the USACE Arroyo Seco Ecosystem Study.</p> <p>https://www.arroyoseco.org/corpsstudy.htm</p>
2006	<p>Arroyo Seco Watershed Management and Restoration Plan adopted by State Water Resources Control Board. This plan contains conceptual designs for the San Rafael Creek and the ARC area.</p> <p>https://www.arroyoseco.org/documents/arroyoseco%20wmp2006.pdf</p> <p>San Rafael Creek Restoration</p> <p>https://www.arroyoseco.org/documents/NET2006/San%20Rafael%20Appendix.pdf</p>
2011	<p>2011 US Army Corps of Engineers Arroyo Seco Ecosystem Restoration Study</p> <p>https://www.arroyoseco.org/corps/USACE_Arroyo_Seco_FSM.pdf</p>
2011	<p>2011 Roadmap to Large Scale Ecosystem Restoration of the Arroyo Seco</p> <p>Prepared by Wendy Katagi, Ted Johnson, and Tim Brick.</p>

	https://www.arroyoseco.org/documents/2011%20Roadmap%20to%20Large-Scale%20Ecosystem%20Restoration%20AS.pdf
2011	Arroyo Seco Watershed Assessment prepared for Arroyo Seco Foundation by CDM Smith https://www.arroyoseco.org/documents/watershed-assessment-final.pdf
2015	City of Pasadena Lower Arroyo Master Plan Revised 2015 https://www.arroyoseco.org/aswrfs.htm
2019	Stillwater Sciences Tour Handout on nature-based planning and ecosystem restoration at San Rafael Creek and the San Pascual site. https://www.arroyoseco.org/documents/planning/StillwaterTour.pdf
2021	Upper LA River and Tributaries Working Group - Arroyo Seco Recommendations This official working group was set up by the Santa Monica Mountains Conservancy to make recommendations about priority watershed projects to State of California agencies. There are major recommendations regarding Arroyo Seco environmental restoration. https://www.arroyoseco.org/documents/ULART_Asr.pdf