

CORRESPONDENCE FROM
10/7/2026

MUNICIPAL SERVICES
COMMITTEE MEETING

To: Municipal Services Committee Special Meeting, October 7, 2026
From: Barbara Eisenstein,
Re: Item 4 – Regional Stormwater Capture Project Portfolio: Update, Arroyo Seco Water Reuse Project
Date: October 5, 2026

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2026 OCT -6 AM 7:47

CITY CLERK
CITY OF PASADENA

Dear Chair Jones and Members of the Municipal Services Committee:

Please include this comment in the record for Item 4, “Regional Stormwater Capture Project Portfolio – Update.”

I urge you to recommend that City Council stop advancing the current Arroyo Seco Water Reuse Project and begin a community-led restoration planning process guided by Slow Water principles.

For more than twenty years, I have led Friends of South Pasadena Nature Park, working with volunteers to restore native habitat along the Arroyo Seco. I support improving water quality. But that goal must be pursued alongside protection of stream flow, wildlife, existing wetlands, cultural resources, and the communities that care for this place.

Public outreach has not provided meaningful participation

The Arroyo Seco connects Pasadena, South Pasadena, and Los Angeles. A project that changes its flow and removes habitat deserves meaningful participation from all three communities before fundamental decisions are made.

In my experience, outreach has fallen short of that standard. Residents and park stewards have had to work persistently to obtain information, raise concerns, and press for consideration of a restoration alternative. Presentations explaining an already developed proposal do not substitute for inviting communities to help define the problem, establish goals, and evaluate different approaches.

The October 7 staff report characterizes more significant community concerns as centered primarily on San Pascual. My concerns extend to both sites, the connecting stream, and downstream habitat. Diverting San Rafael Creek affects more than the property where infrastructure would be installed.

Respect the Kizh Nation’s request for full avoidance

In his June 30, 2025 comment letter, Hereditary Chief Andrew Salas of the Gabrieleño Band of Mission Indians–Kizh Nation formally requests “full avoidance of this location.” He identifies the project area as ancestral tribal territory with sacred sites and known and potential tribal cultural resources, including a high probability of encountering ancestral human remains. He also states that complete formal tribal consultation had not occurred.

The Committee should address this request directly. Inviting the Kizh Nation to participate while continuing to advance construction in the location they have asked the cities to avoid is insufficient. Please respect their request that this land not be used for the proposed facilities, and develop alternatives through meaningful consultation with the Kizh Nation alongside participation from the communities along the Arroyo Seco.

Required permits cannot be assumed

Both San Rafael and San Pascual face serious unresolved issues that put necessary approvals at risk.

The Los Angeles Regional Water Quality Control Board's July 2, 2026 letter identifies potential harm from diverting San Rafael Creek and removing the existing stream and wetland at San Pascual. It calls for a demonstration that the chosen design is the least environmentally damaging practicable alternative and expressly warns that Section 401 water-quality certification may be denied if that requirement is not met.

The Board also clarifies that this particular project is not mandated by the applicable clean-water requirements. Its letter challenges the project's claimed compliance benefits and identifies deficiencies in the assessment of downstream and cumulative impacts.

These are fundamental concerns about whether the proposed approach can be approved. They deserve resolution before additional public money and institutional momentum make changing direction more difficult.

Please require staff to provide a public accounting of each outstanding permit or authorization, the unresolved issues, and the steps needed to address them.

Reducing downstream flow sets a damaging precedent

I am especially concerned about the precedent this project could establish for other Measure W proposals advanced by Pasadena and South Pasadena: treating water already flowing in the Arroyo Seco as available for capture without adequately accounting for the living stream downstream.

Water in the Arroyo supports habitat and connects the watershed. Removing it can undermine restoration even when the individual project is described as providing water-quality or water-supply benefits.

The Water Board specifically calls for cumulative analysis of other planned diversions, including the Arroyo Park Infiltration Gallery. The California Department of Fish and Wildlife also raises concerns about reduced flows affecting downstream habitat and foreseeable restoration projects.

Each proposal must be evaluated as part of the same watershed. Reviewing projects individually risks approving a series of diversions whose combined effects leave too little water for ecological needs. Wet-weather and dry-weather flows must be assessed separately, with particular attention to drought conditions.

Measure W investments should help restore the Arroyo's ecological function. Please establish protection of downstream flow as a planning requirement across the cities' project portfolios.

Start with restoration and community partnership

Please recommend an independent feasibility study of a Slow Water and stream-restoration alternative: protecting existing wetlands, giving water room to slow and spread where appropriate, encouraging infiltration in suitable locations, and preserving flows needed downstream.

The study should examine pollution prevention and treatment before runoff enters the stream, flood safety, habitat protection, fish passage, the long-term potential for steelhead restoration, maintenance costs, and cumulative effects.

Past spending should not lock us into a project with unresolved ecological, cultural, community, and permitting problems. We have an opportunity to create a better project – one developed with the communities along the Arroyo Seco and built around restoring the stream.

Sincerely,

Barbara Eisenstein

Founder and Head, Friends of South Pasadena Nature Park

Links

Water Board, July 2, 2026 letter, https://ceqanet.lci.ca.gov/2023110605/6/Attachment/dn09sj?utm_source=chatgpt.com

California Department of Fish and Wildlife comment letter, July 2, 2026
<https://ceqanet.lci.ca.gov/2023110605/6/Attachment/BI249I>

Chief Salas's June 30, 2025 comment letter,
<https://www.arroyoseco.org/documents/20250630%20Kizh%20Formal%20Comments.pdf>

Sabha, Tamer

From: Jessica Richards
Sent: Wednesday, October 7, 2026 9:17 AM
To: PublicComment-AutoResponse; Rivas, Jessica
Subject: Public comment stormwater projects

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Hello,

I'm writing to urge the members of the municipal services committee to ensure that stormwater projects do not result in loss of mature tree canopy. *Replacement is a myth*. It takes 70 years to replace a 70 year old tree. Loss in mature canopy is a public health issue. Each .03% of canopy loss contributes to 105 climate-related deaths (Garcia, H.C. et al, 2026). Trees are critical infrastructure and public health assets.

I'm particularly concerned about the robust coast live oaks encroached upon in the Jefferson Park project. We are losing mature oaks at a troubling rate due to disease and harsh conditions. These are very healthy specimens and the full root zone must protected (no excavation or heavy machinery).

We must not trade a loss for a potential benefit.

Thank you,

Jessica Richards
UFAC Commissioner
President Bungalow Heaven
Neighborhood Association

McMillan, Acquanette (Netta)

From: Karon French <[REDACTED]>
Sent: Wednesday, October 7, 2026 4:21 PM
To: PublicComment-AutoResponse
Subject: Public Comment for Municipal Services Meeting Oct 7 2026

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1. The preliminary plans for Jefferson Park Stormwater Project do not align with what the city has maintained on their Stormwater Capture website for the past 8 months. The plans are for a stormwater facility that is more than *twice as large in size and capacity* as was discussed in public input events and posted online.
2. This expanded preliminary plan comes at the end of the community input process. Never in the process was the possibility of a much larger underground facility discussed. Making such a significant change at the end of the process brings up concerns about the City's transparency.
3. A major concern raised by members of the public was protecting two irreplaceable 100+ year-old California native oaks. Construction of this much larger facility could easily encroach on the root system of the oak that borders the softball field. Moreover, the placement of the splash pad in the current plan seems to extend under the dripline of the magnificent oak closest to the multipurpose field. Information provided by the Native Oak Society indicates the requirement for space between an established oak's dripline and construction digging is more than the typical amount specified by county/city regulations
4. According to de Vinck's memorandum, the Feasibility Study for Jefferson Park was completed in July 2026. The fact is that it was completed in late September (at least that's when it was released to the public). Pointing this out is not being picky. It relates again to how well the City will oversee the details of the construction process and the planned park improvements.

--Karon and Kerry French