



July 30, 2020

Hayden Melbourn <[hmelbourn@cityofpasadena.net](mailto:hmelbourn@cityofpasadena.net)>  
City of Pasadena, Department of Public Works  
Cc: Jeff Kuhn <[JKhun@cityofpasadena.net](mailto:JKhun@cityofpasadena.net)>  
VIA EMAIL

RE: Lower Arroyo Seco Habitat Restoration Plan (CIP #77410)

Dear Mr. Melbourn -

The West Pasadena Residents' Association (WPRA) represents neighborhoods located adjacent to Pasadena's lower Arroyo Seco. Our organization has long been interested in the restoration and management of this section of the Arroyo.

Recently, we received indirect notice that a major vegetation restoration project was set to be instituted in the Arroyo area below the Van de Camp (La Loma) Bridge, and we requested additional time to respond. We appreciate your extending the period for comment to the close of business July 31, 2020.

Apart from the set of plans that you recently forwarded, we have been unable to find any mention or further description of the project on the City's website. While we might have missed it, we are unaware of any previous public notice, hearing or environmental consideration of the project.

Without background details, it is quite difficult to evaluate this project. While WPRA generally supports prudent restoration activities—including replacement of invasive vegetation with native plants—we are concerned with the nature and timing of this project. Without a reasonably inclusive public process, information on the timing and use of funds, an assessment of the habitat value of existing plants, and the plans for the long term maintenance of replantings—including how irrigation will be successfully managed—we cannot support this project as proposed. If the grant funds that are intended to be used for this project will expire, we trust that the City will require its out-of-area contractor to carefully proceed to restore native plants in ways that will maintain and improve the existing habitat values of this segment of the Arroyo.

In many respects, the absence of native vegetation from the Arroyo stems from the lack of stream flow, an issue that will be exacerbated by the City's proposed Arroyo Seco

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Canyon project intended to capture more of the water from the stream. This disconnected project in the lower Arroyo ignores the consequences of other activities, failing to consider reference to an integrated program to restore the natural features and functions of Pasadena's Arroyo Seco.

We are troubled that the record of this project unfortunately characterizes the City's recent approach to management, maintenance, and restoration of the Arroyo, an approach that appears to be increasingly piecemeal and uncoordinated, spread among a number of different city departments and outside entities, lacking transparency and meaningful opportunities for public participation.

The City had instituted a process several years ago to enhance and unify the values that we all treasure in this rare natural asset. Yet we find that the City's approach to managing activities, uses and restoration actions in Pasadena's three Arroyo segments has not been improved, largely proceeding without apparent regard to the content of previously approved master plans and studies, and without pursuing any analysis of how to ensure wise and equitable use of the Arroyo by its many claimants, including wildlife.

Most importantly, we recommend that the city reacquire full control of the use, management and restoration of the Arroyo Seco and centralize that activity in a single city agency. We look forward to working with the city as a neighborhood organization intimately involved with and concerned about the Arroyo Seco.

Cordially,



Dan Beal, President  
for the WPRB Board of Directors

C: Councilmember Steve Madison  
Takako Suzuki, Field Representative  
Steve Mermell, City Manager  
Ara Maloyian, Director, Department of Public Works

The WPRB is an all-volunteer organization dedicated to maintaining and enhancing the quality of life in southwest Pasadena. We represent 7,000 households, including 1,000 paid members.