



GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION  
Historically known as The San Gabriel Band of Mission Indians recognized by the State of California as the  
aboriginal tribe of the Los Angeles basin

**Formal Comment Letter Regarding Natural Resources Concerns**

Monday, June 30, 2025

Christina Monde, P.E.  
City of Pasadena Department of Public Works  
100 North Garfield Avenue, Suite N306  
Pasadena, CA 91101

Subject: Formal Comment on the Proposed Arroyo Seco Water Reuse Project

**Dear Ms. Monde,**

On behalf of the Gabrieleño Band of Mission Indians – Kizh Nation, this letter serves as a formal opposition to the Arroyo Seco Water Reuse Project as currently proposed. We are particularly concerned about the potential impacts to protected Tribal natural resources within and adjacent to the project sites in the Lower Arroyo Seco.

While the project is presented as delivering environmental and water quality benefits, we understand that approximately 12% of the captured water will be diverted to irrigate the Arroyo Seco Golf Course. This allocation undermines the project's stated goals of groundwater recharge and habitat restoration. The protection and preservation of Tribal natural resources must remain central to this project's implementation.

**Recommendations for Draft EIR Review**

**1. Impacts on Protected Natural Resources**

**Biological and Habitat Concerns**

The Arroyo Seco supports a variety of sensitive and protected species, including the southwestern willow flycatcher (*Empidonax traillii extimus*), least Bell's vireo (*Vireo bellii pusillus*), coast horned lizard (*Phrynosoma blainvillii*), and western mastiff bat (*Eumops perotis californicus*). These species are listed or considered for listing by the California Department of Fish and Wildlife and are key indicators of ecosystem health.

Additionally, the area contains culturally significant plant species such as mugwort (*Artemisia douglasiana*) and western sycamore (*Platanus racemosa*), which hold sacred value to the Kizh Nation. The construction of stormwater capture and treatment facilities risks disrupting these habitats.

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Mike Jesus Lemos, Treasurer I

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While native landscaping is proposed, its compatibility with existing in-stream resources must be carefully assessed. Pre-construction biological surveys, habitat restoration planning, and adaptive management practices should be implemented to mitigate these impacts and inform the environmental review process.

### **Hydrological and Water Quality Impacts**

We support the goal of improving water quality and enhancing groundwater recharge. However, diverting and treating stormwater has the potential to alter natural hydrological patterns, disrupt sediment transport, and impact groundwater connectivity—especially during seasonal fluctuations. These alterations must be thoroughly studied and mitigated to avoid long-term ecological damage.

The Draft EIR should address the cumulative impacts of habitat fragmentation, noise, and hydrological changes in this already urbanized and ecologically fragile corridor.

### **Recommendations for the EIR**

- Conduct comprehensive biological surveys to identify sensitive species and culturally significant plants and implement corresponding mitigation measures.
- Design stormwater facilities that mimic natural hydrology and minimize disruption to existing sediment dynamics.
- Ensure trail and hardscape features reflect the natural character of the Arroyo Seco and are ecologically sensitive.
- Establish a robust public engagement process to educate stakeholders and foster transparency.
- Monitor ecological and hydrological conditions throughout construction and post-construction to detect and address any emerging impacts.

The Arroyo Seco Water Reuse Project has the potential to set a precedent for sustainable development in the Upper Los Angeles River Watershed. However, such progress must not come at the cost of Tribal cultural and ecological integrity. We urge the City of Pasadena to implement the above recommendations and center the protection of natural and cultural resources in all planning and mitigation efforts.

Thank you for your time and consideration. I remain available for continued consultation and to provide further clarification as needed.

Respectfully,

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