

HISTORIC HIGHLAND PARK NEIGHBORHOOD COUNCIL
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CALIFORNIA

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HISTORIC HIGHLAND PARK NEIGHBORHOOD COUNCIL

Community Impact Statement

Title: *In Opposition to Council File 26-0777: Develop the Record Before the City Goes on Record*

Council File: [26-0777](#) — Gabrieleno Band of Mission Indians-Kizh Nation / Pasadena / South Pasadena / Arroyo Seco Water Reuse Project

Status: Pending in Rules, Elections and Intergovernmental Relations Committee (introduced 5/22/2026; Mover: Jurado; Second: Padilla)

SUMMARY (250 words, included in CIS submission)

Council File 26-0777 — Position: Against

The Historic Highland Park Neighborhood Council opposes adoption of Council File 26-0777 as drafted. CF 26-0777 would place the City of Los Angeles on record opposing the Arroyo Seco Water Reuse Project and urging its abandonment, on environmental and tribal-consultation grounds.

HPNC's opposition is to the resolution's premature posture. The resolution asks the City to take a final position before the record that position should rest on exists.

The lead agencies moved from a Mitigated Negative Declaration to a full Environmental Impact Report; the Draft EIR is currently in public review. The record before the Committee does not include current departmental analyses of the City-owned parcel, applicable legal authority, alternatives, mitigation, or the City's regional water-quality obligations.

The record likewise does not establish how the City of Los Angeles has assessed the tribal-consultation context underlying the resolution's claims. Publicly available consultation

materials reflect a broader Gabrieleño/Tongva representational field than the resolution addresses.

HHPNC asks the Rules, Elections and Intergovernmental Relations Committee to **hold CF 26-0777** and **request reports** from RAP, the City Attorney, the Bureau of Engineering, LA Sanitation, and the CAO/CLA — including, from the City Attorney, the basis and scope of the City's tribal-consultation framework for this matter — and to await the completed EIR. Alternatively, the Committee may **decline to advance the resolution**, allowing the in-progress processes to conclude.

We oppose the City taking a position without the record to support it.

CIS

HHPNC opposes the Resolution in Council File 26-0777 due to the resolution's premature posture and to the absence of a record describing its basis of that posture. The City is being asked to fix a final, on-the-record position before that record exists. This concern applies to both of the resolution's primary grounds: environmental and tribal-consultation.

1. On environmental grounds

The project is currently in the Draft EIR public review phase of a full Environmental Impact Report under CEQA. The lead agencies moved from a Mitigated Negative Declaration to a full EIR in response to community and tribal concerns; that review process is in progress. The record before the Committee on CF 26-0777 does not include current departmental analyses of the matters the resolution turns on:

- the status of the City-owned parcel and applicable land-use authority, including the in-progress lease arrangement (Department of Recreation and Parks);
- legal questions surrounding lease, use, and conveyance (City Attorney);
- engineering scope, mitigation, and alternatives (Bureau of Engineering; LA Sanitation);
- the City's regional water-quality and stormwater obligations (LA Sanitation; CAO/CLA).

Other analyses and reports may be warranted to gain a comprehensive view of the many intersecting and occasionally interdependent matters.

2. On tribal-consultation grounds.

The resolution rests in significant part on tribal-consultation concerns, but the record before the Committee does not establish how the City of Los Angeles has assessed the tribal-consultation context underlying those concerns. Publicly available consultation materials developed for this project reflect a broader Gabrieleño/Tongva representational field than the resolution addresses.

Adopting a tribal-consultation-grounded position without a public assessment of that context raises the same governance concern as would the adoption of an environmental position before completing an EIR: It means the City would be going on record without a record to back up its position.

HHPNC takes no position on questions of tribal representation, but believes the City should not adopt a position on those questions without a public assessment from the City Attorney and the relevant departments.

Community Impact

The Arroyo Seco watershed runs through our neighborhood and through the daily lives of residents on both sides of the city line. Stormwater runoff is a documented source of pollution affecting communities upstream and downstream of the proposed project. Clean water, runoff capture, climate resilience, habitat improvement, the integrity of City-owned open space, and the City's care in matters involving Indigenous communities are all neighborhood concerns. Each of them depends on the City making this decision based on evidence. Indeed, public confidence – including in the City's decision-making process – is itself a neighborhood interest.

Recommended Action

HHPNC respectfully urges the Rules, Elections and Intergovernmental Relations Committee to **hold CF 26-0777** and **request reports** from the Department of Recreation and Parks, the City Attorney, the Bureau of Engineering, LA Sanitation, and the CAO/CLA on the matters identified above. The report request to the City Attorney should expressly include the basis and scope of the City of Los Angeles' tribal-consultation framework for this matter, including how the City identifies relevant tribal entities for consultation on projects involving City-owned land.

Alternatively, the Committee may **decline to advance CF 26-0777**, allowing the in-progress CEQA process and other applicable City, regional, and intergovernmental processes to proceed and conclude before the City considers a position on the project.

Either action would address HHPNC's core concern: the City should develop the record before it goes on record.