

GENERAL INFORMATION ABOUT THE CONTENTS OF THIS FILE

Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARS ONLINE:

**If you are using Explorer, you need will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS



Item No. 06

Department of City Planning

City Hall, 200 N. Spring Street, Room 701, Los Angeles, CA 90012

January 6, 2026

TO: Los Angeles City Planning Commission

FROM: Diego Janacua Cortez, City Planner
Department of City Planning, Code Studies

TECHNICAL MODIFICATIONS AND CORRECTIONS TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2025-6189-CA; CITYWIDE CODE AMENDMENT FOR THE 2028 OLYMPIC AND PARALYMPIC PLANNING AND ZONING EXEMPTION ORDINANCE

The following technical modifications and corrections are to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of January 8, 2026, related to Item No. 06 on the meeting agenda.

(**Additions** are in underline and **deletions** are in ~~striketrough~~).

Modify page 4 of *Exhibit A. Revised Proposed Ordinance* Section 12.22 A.40(f)(3) of Chapter I of the Los Angeles Municipal Code to read as follows:

- (3) Any conflicting existing conditions associated with planning entitlement approvals ~~and all planning and zoning regulations~~ are suspended only for the duration of the provisions of this Subdivision ~~or the temporary permit per LAMC Section 91.106.1.3. (Temporary Permit)~~, whichever is greater, unless permanent relief is granted through the procedures for a Permanent Project in Section 12.22 A.40.(h).

Modify page 11 of *Exhibit A. Revised Proposed Ordinance* Sec. 1.7.1.F.3. of Chapter 1A of the Los Angeles Municipal Code to read as follows:

3. Any conflicting existing conditions associated with planning entitlement approvals ~~and all planning and zoning regulations~~ are suspended only for the duration of the provisions of this ~~Section or the temporary permit per Chapter IX. (Building Regulations), Sec. 91.106.1.3. (Temporary Permit)~~

~~of this Code, whichever is greater, unless permanent relief is granted through the permanent procedures in Sec.1.7.1.G.2. (Process for a Permanent Project), below.~~

Reason: Staff recommends modifications and corrections to page 4 and page 11 of Exhibit A in the staff recommendation report to provide clarity on the types of conditions that are suspended when a Temporary Olympic and/or Paralympic Project is granted the planning and zoning relief, and to correct typographical errors. The intention for the technical modification is to clarify that only any existing conditions in a current planning entitlement approval that conflict with a Temporary Project would be suspended, rather than all existing conditions that are applicable to a previous planning entitlement approval. This provides clarity for both staff and applicants relative to what conditions are suspended under the Ordinance. Additionally, the omission of the reference to Temporary Permits per LAMC Section 91.106.1.3, whichever is greater, is necessary in order to align with the ordinance's expiration date of February 27, 2028. Also, a technical correction capitalizes the word "Permanent Project" for consistency throughout the Ordinance and since it is a defined term.

Modify page 5 of Exhibit A. Revised Proposed Ordinance Section 12.22 A.40(g)(1)(i) of Chapter I of the Los Angeles Municipal Code to read as follows:

- (i) Applicants of eligible Temporary Projects pursuant to Section 12.22 A.40.(d)(2) located within an approved competition venue shall file an administrative review ~~permit~~-application with the Department of City Planning~~Building and Safety~~.

Modify page 11 of Exhibit A. Revised Proposed Ordinance Sec. 1.7.1.G.1.a.i. of Chapter 1A of the Los Angeles Municipal Code to read as follows:

- i. Applicants of eligible Temporary Projects, pursuant to Sec. 1.7.1.D.2., above, located within an approved competition venue shall file an administrative review ~~permit~~-application with the Department of City Planning~~Building and Safety~~.

Reason: Staff recommends modifications to page 5 and 11 of Exhibit A to provide greater detail and clarity for staff and applicants as it relates to the process for Temporary Projects. The intention of this technical modification is to clarify that an administrative review application must be submitted to the Department of City Planning, before submitting any building permit applications to the Department of Building and Safety. The Department of City Planning staff will intake the Temporary Project applications and review them for completeness and eligibility.

Modify page 13 of Exhibit A. Revised Proposed Ordinance Sec. 1.7.1.G.2.d. of Chapter 1A of the Los Angeles Municipal Code to read as follows:

d. Conditions

The City Council shall have the authority to add, modify, and/or remove conditions to an existing quasi-judicial approval to make an Olympic and/or Paralympic Project permanent. Any changes to existing conditions shall be detailed within the Resolution and the applicant shall be responsible for recording and applying any changes through the appropriate bodies, including but not limited to the City Planning Department.

Reason: Staff recommends this technical correction to align the Chapter 1A version with the Chapter I version text that states “and/or” which clarify that City Council has the authority to add, modify, and/or remove conditions to an existing quasi-judicial approval.



United Neighborhoods for Los Angeles

UN4LA Board

Casey Maddren, President
Gina Thornburg, Vice-President
Cherilyn Smith, Treasurer
David Ewing
Annie Gagen
Jack Humphreville
Dick Platkin

January 5, 2025

City Planning Commission
Los Angeles City Hall
200 N. Spring St., Los Angeles, CA 90012

Re: Olympic Zoning Exemption Ordinance, CPC-2025-6189-CA, CEQA: ENV-2025-6190-SE
OPPOSED

Members of the City Planning Commission,

United Neighborhoods for Los Angeles (UN4LA) is writing to state its strong opposition to the Olympic and Paralympic Planning and Zoning Exemption Ordinance. Our opposition is primarily based on the following three criteria:

- Los Angeles City officials and LA 28 officials have repeatedly stated that the City would build no new permanent venues and instead will rely exclusively on existing and temporary venues;
- The proposed project is not exempt under the California Environmental Quality Act (CEQA) pursuant to the California Public Resources Code Section 21080(b)(7) and CEQA Guidelines Section 15272; and
- Section 1(c) of the proposed ordinance states that Olympic/Paralympic Projects shall not be considered a project nor require any review procedures under any Specific Plan, Supplemental Use District, Streetscape Plan, Redevelopment Plan, etc.

The proposed ordinance is both a violation of the California Environmental Quality Act (CEQA) and a betrayal of the trust of the people of Los Angeles. From the time that Los Angeles was first proposed as the host for the 2028 Olympics, up until fairly recently, both LA City officials and representatives of LA 28 repeatedly stated that the city would not need to build new permanent venues, and instead would rely on existing and temporary venues. The LA 28 website states that the city will not build permanent infrastructure:

[WHAT INFRASTRUCTURE IS NEEDED TO HOST THE GAMES?](#)

"As a global leader in sports, entertainment and technology, LA is built to host large-scale, sustainable, global events that benefit everyone and will be the first-ever games to not build permanent infrastructure."

As recently as July 2024, Mayor Karen Bass issued a press release stating the following:

[PREPARING FOR THE GAMES: MAYOR BASS ANNOUNCES TRIPS TO PARIS TO PREPARE LOS ANGELES TO HOST THE 2028 OLYMPIC AND PARALYMPIC GAMES. July 22, 2024](#)

"Los Angeles' commitment to host more sustainable Games dates back to the bid, with a pledge to radical reuse by leveraging the city's wealth of existing world-class venues. The 2028 Summer Games will become the first-ever Games to build no new permanent venues, and instead will rely exclusively on existing and temporary venues."

When former Mayor Garcetti and his colleagues first proposed that LA be the host city, many Angelenos voiced fear over the possibility that LA would be burdened by the same problems as other host cities that chose to build new venues for the games. Officials used the "no build" promise to allay those fears. Mayor Bass has repeated that pledge, as quoted above. The proposed ordinance represents a betrayal of those promises, and stands as further evidence that the citizens of Los Angeles cannot trust our elected officials.

Furthermore, the proposed ordinance is not exempt under CEQA. CA PRC 21080(b)(7) is clearly intended to provide an exemption only for the construction of temporary facilities. The proposed ordinance makes clear that it is intended to cover the construction of permanent facilities. CEQA Guidelines Section 15272 also makes clear that new construction of Olympics facilities is not exempt. For these reasons, the CPC cannot determine that the proposed project is statutorily exempt from CEQA.

The Sepulveda Basin venues are owned by the US Army Corps of Engineers (the Corps), and the portion containing the venues is leased to the city's Department of Recreation and Parks. The nature of the events would currently require National Environmental Policy Act (NEPA) review, and it appears it might also be subject to CEQA. In addition, a new draft master plan for the basin is underway by the Corps and should be out for review in the spring.

The venue directly north of Lake Balboa is adjacent to known nesting sites for the endangered Bell's Vireo. Some of the venues appear to be on the Woodley Lakes Golf Course, also known for Bell's Vireo nesting sites. This bird species typically nests from late March through July, with some individuals persisting later. It is critical that the City of LA accommodate these nesting sites so that they will not be harmed or destroyed. The habitat surrounding these sites is critically important.

Finally, Section 1(c) of the proposed ordinance states that an Olympic Project shall not be considered a project nor require any review procedures under any Specific Plan, Supplemental Use District, Streetscape Plan, etc., and that its provisions shall prevail and supersede any conflicting planning and zoning regulations. This makes a mockery of planning in Los Angeles. Additionally, the City of LA does not have the authority to unilaterally override State-approved Redevelopment Plans.

For these reasons, we urge you to reject the proposed ordinance. Thank you for your time.

Sincerely,
Casey Maddren, President

DAY OF HEARING SUBMISSIONS

LAW OFFICE OF JOHN P. GIVEN
2309 Santa Monica Blvd., #438
Santa Monica, CA 90404
john@johngivenlaw.com
(310) 471-8485

January 7, 2026

By Email Only to cpc@lacity.org

Los Angeles City Planning Commission
Monique Lawshe, President
200 N. Spring Street
Los Angeles, CA 90012

RE: 2028 Olympic and Paralympic Planning and Zoning Exemption Ordinance
January 8, 2026 City Planning Commission Meeting, Agenda Item 6
Objection to Statutory CEQA Exemption
CPC-2025-6189-CA // ENV-2025-6190-SE

Honorable President Lawshe and Commissioners:

Before the City Planning Commission is a proposed code amendment to adopt the 2028 Olympic and Paralympic Planning and Zoning Exemption Ordinance, which would “exempt certain 2028 Olympic and Paralympic Games (Games) related projects from planning and zoning requirements of the Zoning Code in preparation for the Games.” (Recommendation Report, p. 1.) The proposed exemptions are for both temporary *and permanent* projects. (*Id.*, pp. A-5) The Recommendation Report suggests that the proposed ordinance is itself exempt from the California Environmental Quality Act (CEQA) on the basis that it is statutorily exempt under Public Resources Code section 21080, subdivision (b)(7) and CEQA Guidelines section 15272, as both amended in 2025 by Assembly Bill 149.

The ordinance as proposed grossly exceeds the scope of the statutory exemption, which does not extend to permanent projects. Original Public Resources Code section 21080, subdivision (b)(7) clearly did not exempt the construction of facilities, whether temporary or permanent. As amended by AB 149, a new paragraph, subdivision (b)(7)(B) provides an exception to the construction exception, and now allows *temporary* facilities to be constructed:

Notwithstanding subparagraph (A), [CEQA] does not apply to the construction of temporary facilities for the 2028 Olympic Games and Paralympic Games. For purposes of this subparagraph, “temporary facility” means a facility that will be completely removed and the area restored to a clean and safe condition within six months after the end of the 2028 Olympic Games and Paralympic Games.

The (b)(7)(B) exception clearly does not extend to *permanent* facilities, which the ordinance allows. The ordinance as proposed is thus not exempt from CEQA, because it exceeds the scope of the statutory exemption. The draft Notice of Exemption and justification for the exemption included as Exhibit C in the Recommendation Report makes this abundantly clear

when it opines: “Any permanent physical development or construction of facilities needed for the Games would remain subject to CEQA review unless separately exempt under other provisions of the CEQA Guidelines.”

An additional concern is that the ordinance not only permits permanent facilities, but also permits projects first approved as temporary facilities to later apply for permanent facility status, meaning temporary facilities may not really be temporary. (Recommendation Report, p. A-6: “This permanent pathway could be utilized by projects that have previously received temporary relief, as well as those making an initial request for permanent relief.”¹ As drafted, even the temporary facilities portion of the ordinance could be subject to legal challenge under CEQA—if a temporary construction project can later become permanent, it is not truly temporary, and the statutory exemption should not apply to it.

The obvious solution that would allow the proposed ordinance to use the CEQA exemption found in Public Resources Code section 21080, subdivision (b)(7), is to strip permanent projects from the ordinance and remove any pathway that would allow temporary projects to later become permanent without having first undergone an appropriate level of environmental review. As proposed the ordinance is clearly not lawful as it does not meet the construction exemption requirements created by AB 149 which allow only temporary projects. Moreover, if the City adopts the ordinance as proposed, all projects approved under the ordinance, including those that might have benefited from the AB 149 temporary construction exemption either individually or through a lawfully adopted ordinance, will be in significant legal jeopardy.

I am agnostic as to whether the ordinance represents good planning policy, but if the City Planning Commission decides to support the ordinance and recommend approval, it should condition that recommendation on the changes suggested above.

Sincerely,



John P. Given

Cc:

Vincent P. Bertoni, AICP, Director of Planning

¹ See Dec. 30 draft ordinance, p. 6 (proposed LAMC section 12.22 A, subd. (h)(3)) and p. 13 (proposed LAMC section 1.7.1, subd. (G)(2)(c)): “For Temporary Projects seeking Permanent Project relief, a building permit modification shall be filed with the Department of Building and Safety.”



Cecilia Lamas <cecilia.lamas@lacity.org>

2028 Olympic and Paralympic Planning and Zoning Exemption- CPC 2025-6189-CA, Env 2025-6190-SE

Ricarda Bennett <rbennett@bennettgroup.biz>

Thu, Jan 8, 2026 at 8:00 AM

To: cecilia.lamas@lacity.org

1/7/26

Dear Ms. Lamas

I tried to submit my comment to cpc@lacity.org but the link went only to a blank page.

I would like the Planning Commission to consider the conversion of Emergency Helicopter Landing Facilities (EHLF) which are helicopter landing sites for first responder agencies (LAFD, LAPD) to temporary private use landing sites for Olympic related events. This would need to be an exception to the "not eligible" item for air taxis or "aerial mobility projects".

Please submit this to the comments section for the hearing Jan. 8, 2026.

Thank you for your help.

Best, Ricarda Bennett

Ricarda Bennett

Heliport Consultants

c: 805.795.2211