Office of the Los Angeles City Attorney
Hydee Feldstein Soto

REPORT NO. R26-0602

OCT 21, 2026

REPORT RE:

DRAFT ORDINANCE AMENDING THE CORNFIELD ARROYO SECO SPECIFIC PLAN (ORDINANCE NO. 182,617), (CASP), TO REQUIRE CONDITIONAL USE PERMITS FOR WAREHOUSING, DISTRIBUTION, AND STORAGE USES OVER 15,000 SQUARE FEET
(COUNCIL DISTRICT 1)

The Honorable City Council
of the City of Los Angeles
Room 395, City Hall
200 North Spring Street
Los Angeles, California 90012

Council File No. 13-0078-S2

Honorable Members:

This Office has prepared and now transmits for your consideration the enclosed draft ordinance, approved as to form and legality. The enclosed ordinance amends the Cornfield Arroyo Seco Specific Plan (CASP), (Ordinance No. 182,617), to require that any warehouse, distribution, or storage use involving a building over 15,000 square feet is required to obtain a conditional use permit (Draft Ordinance).

Background

On October 29, 2024, the City Council certified the CASP Update environmental impact report (EIR), adopted amendments to the General Plan land use map for the CASP area, and adopted related amendments to the Framework Element, and requested this Office to prepare and transmit draft ordinances to implement the CASP

Update, including an ordinance to amend the whole Cornfield Arroyo Specific Plan. (Council File No. 13-0078-S2).

On November 6, 2024, the City Council adopted an Interim Control Ordinance (Ord. No. 188,402) (ICO) to prohibit the issuance of permits for warehousing, distribution, and storage uses in excess of 15,000 cumulative square feet within the Cornfield Arroyo Seco Specific Plan. (Council File No. 13-0074-S3). The ICO expires on November 11, 2026.

In anticipation of the forthcoming expiration of the ICO, on October 20, 2026, the City Council adopted a motion (Council File No. 13-0078-S2) to request this Office transmit the Draft Ordinance with an Urgency Clause, to partially amend the CASP, to provide that the "Warehousing, Distribution, and Storage" use in the Use Classification Table in Section 2.1.D be amended to provide that the use requires a Conditional Use Permit for any project over 15,000 square feet. The Draft Ordinance is requested by the City Council to be transmitted ahead of the other ordinances requested for the whole CASP Update. The amendment in the Draft Ordinance is included in the originally proposed ordinance to amend the whole CASP (See pages 43, 55, and 67 of "Exhibit D1", dated September 25, 2024, attached to the City Council file). The Draft Ordinance will allow this policy to be implemented before the ICO expires, and will implement the City Council policy for the CASP Update adopted in its October 29, 2024, action requesting ordinances to implement the whole CASP Update.

Charter Findings

Charter Section 558(b)(3) requires the City Council to make the findings required in Subsection (b)(2) of the same section; namely, whether adoption of the Draft Ordinance will be in conformity with public necessity, convenience, general welfare and good zoning practice. The City Council can adopt the CPC's findings, as set forth in the CPC's Transmittal Report to City Council, the findings it adopted with the Plan adoption or any updated findings recommended by the Department of City Planning (DCP), as those are set forth in the City Council file, or make its own.

The Draft Ordinance includes an urgency finding. Section 253 of the City Charter provides that the City Council may adopt an urgency finding that will make an ordinance take effect upon publication. Urgency ordinances must include a statement showing its urgency and it must be approved by at least a vote of twelve City Council members. A statement supporting the urgency ordinance is included in the Draft Ordinance and DCP confirms that evidence in support of the finding is found in the administrative records for the CASP Update and the ICO.

California Environmental Quality Act (CEQA) Determination

DCP is recommending that the record includes sufficient basis for the City Council to approve the Draft Ordinance in reliance on the Cornfield Arroyo Specific Plan Update EIR No. ENV-2021-2643-EIR, SCH No. 2021040206. A decisionmaker can approve a project in reliance on a previously certified EIR, if it finds in its independent judgment that based on the whole of the record, no changes to the project, circumstances, or new information (not known or capable of being known when the EIR was certified and project approved) will require a major revision of the EIR due to the involvement of new significant impacts or more severe significant impacts than those identified in the EIR. Public Resources Code § 21166; CEQA Guidelines § 15162 and 15164. DCP recommends City Council find that there has been no change to the project, circumstances, and there is no new information. The Draft Ordinance includes an amendment to the CASP that was included in the project approved when the EIR was certified on October 29, 2024.

Council Rule 38 Referral

A copy of the revised draft ordinance was sent, pursuant to Council Rule 38, to the Department of Building and Safety, with a request that all comments, if any, be presented directly to the City Council when this matter is considered.

If you have any questions regarding this matter, please contact Assistant City Attorney Kathryn C. Phelan at kathryn.phelan@lacity.org. A member of this Office will be available when you consider this matter to answer questions you may have.

Sincerely,

HYDEE FELDSTEIN SOTO, City Attorney

By: John W. Heath
JOHN W. HEATH
Chief Assistant City Attorney

JWH:KCP:jr
Transmittal